



HM Government

UK Anti-Corruption Strategy 2025

Supporting growth
Strengthening security
Protecting democracy



Government of the United Kingdom
Home Office

UK Anti-Corruption Strategy 2025

Supporting growth
Strengthening security
Protecting democracy

Presented to Parliament
by the Secretary of State for the Home Department
by Command of His Majesty

December 2025

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Foreword

Deputy Prime Minister



Corruption is a corrosive force that undermines growth, threatens our national security, and erodes the foundations of our democracy. It destroys trust in public administration, undermines core functions of the state, creates an unfair playing field for business, deprives countries of vital revenues needed for development, and – through illicit finance – fuels crime on our streets and strengthens our enemies. Corruption always causes harm and creates victims. And no organisation or country is immune.

In an era of geopolitical instability and rapid technological change, the UK must lead by example in confronting this shared transnational threat, both at home and abroad. As a country deeply committed to the rule of law, this is our responsibility to the British public. As a global centre for financial and professional services it is also our responsibility to the world. We must leave no space for corruption, or for those that enable it. This commitment will be shown through our actions.

Since the election, this government has already acted decisively to tackle corruption and uphold integrity across public life. The Prime Minister has appointed Baroness Margaret Hodge as the UK's new Anti-Corruption Champion. We have sanctioned kleptocrats and their enablers, and raised standards in public life through announcing a new Ethics and Integrity Commission. We have also safeguarded the integrity of sport, with the Football Governance Act establishing an Independent Football Regulator to safeguard clubs from unsuitable ownership.

We will now go further to grow the economy, support British businesses, secure our borders, tackle the instability overseas that drives organised crime in the UK, and restore trust in the UK and its institutions.

Through this strategy, we will strengthen enforcement against corruption, by expanding the new Domestic Corruption Unit in the City of London Police and harnessing the power of artificial intelligence to accelerate investigations. We will simplify and improve a complex regulatory system by consolidating the anti-money laundering and counter-terrorist financing supervisory functions of the UK's 22 professional services supervisory bodies. We will increase our efforts to dismantle kleptocratic networks in the UK by scaling up our capacity to pursue the professional enablers who make corruption and broader economic crimes possible. At the same time, we will deploy new tools to detect and remove corrupt insiders across policing, border security, and the prison system – closing the gaps that criminals exploit. And we will enhance the UK's international leadership on this issue by hosting a Countering Illicit Finance Summit in 2026.

We will work in close partnership with our international partners, because tackling corruption is a global challenge that requires a global response. With this strategy, the UK reaffirms its leadership and resolve to confront corruption wherever it threatens our prosperity, security and democracy.

A handwritten signature in black ink, appearing to read 'David Lammy'.

The Rt Hon David Lammy MP

Foreword

Security Minister



As the UK's Security Minister, I have seen the role corruption and illicit finance play in driving national security threats that impact the UK. They enable hostile state actors, criminal networks and corrupt elites to undermine our institutions, distort our markets, and erode public trust. As the National Security Strategy sets out, all elements of our security are supported by our ability to tackle these threats.

Bribery and corruption undermine the institutions which are fundamental to our economy and our society. Corrupt insiders make the UK's streets less safe for the public, including enabling serious and organised crime by disclosing sensitive information, facilitating the movement of drugs or undermining immigration controls which keep the public safe.

Corruption undermines security and stability overseas, creating conditions that undermine almost all UK interests – from making it easier for terrorists to operate, to driving irregular migration.

Russia's illegal war against Ukraine has put a spotlight on the ways in which highly corrupted political regimes pose a direct national security threat whether by directly harming our allies and their security, or because they pursue their malign interests on UK soil.

This government will not be complacent about that threat. Earlier this year, I announced an expansion to the government's exclusion guidance, giving the Home Secretary the ability to block elites with links to Putin's regime from entering the UK.

This strategy builds on that, introducing further commitments to make sure corrupt actors, including kleptocrats, are disrupted from exploiting UK society and its institutions, along with a broader set of measures to tackle the harm corruption causes the UK and UK interests overseas, including through working closer with our international partners.

Over the duration of this Parliament, I will lead efforts to ensure this strategy is delivered in full. That means driving implementation across government, supporting our operational partners, and holding the system to account. It means making sure we close down vulnerabilities, bring more corrupt actors to justice, and strengthen our global leadership in the fight against corruption.

A handwritten signature in black ink, which appears to read 'Dan Jarvis'.

Dan Jarvis MBE MP

Foreword

Anti-Corruption Champion



As a global financial centre with an open economy and a strong reputation for the rule of law, I have always passionately believed in the UK's responsibility to lead the fight against corruption and the dirty money that enables it. Our open economy and democracy have made us a target for corrupt actors pursuing their own malign interests.

Corruption makes society and the economy less competitive and less fair. It is a roadblock to growth. Corruption at home and overseas feeds serious organised crime, hostile state activity, and other threats both in the UK and for our allies.

That is why I have dedicated so much of my career to campaigning on this issue, and why I am now pleased to write this foreword for the UK's new Anti-Corruption Strategy. This strategy contains bold and effective actions to reduce the harm caused by corruption to the UK and to UK interests overseas. It introduces several commitments important to me personally, encompassing the values of transparency, accountability and integrity that I have always championed.

The UK has been a global leader in publishing information showing who really owns and benefits from companies registered in the UK. There is more we can do. I am pleased the strategy will launch a government review, which I will lead, of wider asset ownership in the UK, to identify vulnerabilities and make recommendations. I also welcome the strategy's commitment to work with the UK's Overseas Territories and Crown Dependencies to introduce enhanced registers of beneficial ownership.

Professional and business services are a UK success story, but the strong reputation of this sector, so essential to its continued success, can be undermined by questionable higher-risk activity, including from corrupt actors who seek to abuse our systems. So I am delighted that the government will consolidate the anti-money laundering and counter-terrorist financing supervisory functions of 22 professional services supervisory bodies. The Financial Conduct Authority will assume responsibility for the supervision of professional services firms, replacing the current patchwork with a single public sector supervisor that will apply consistent supervision and strengthen enforcement.

Ethics and integrity must be at the heart of the government's approach to public service. I welcome the introduction of an Ethics and Integrity Commission to strengthen probity in public life, and I look forward to continuing to work on this agenda over the lifetime of the strategy.

Corruption is a systematic and insidious problem, and I have been heartened by how closely different parts of government have worked together to tackle these threats. That is testimony to this government's commitment to taking co-ordinated action on a threat that affects our collective growth, security, and international interests. I look forward to playing my part in this, working in partnership with government, the private sector and civil society.

A handwritten signature in black ink, which appears to read 'Margaret Hodge'.

The Rt Hon Baroness Margaret Hodge DBE

Executive summary

1. **Corruption harms the UK and its citizens directly.** It makes British people poorer and less safe, and undermines our democracy. Corruption fuels instability overseas, increasing crime, illegal migration, and other threats back in the UK.¹
2. Corrupt companies securing contracts through unfair procurement steal from the public purse and mean **less money for public services and poor outcomes for taxpayers.** The presence of corrupt practices damages the reputation of the UK, and this in turn undermines our strategy for growth. Corrupt police, prison or border officers accepting bribes means more drugs and weapons on the streets and less criminals in prison. The UK has traditionally prided itself on being a country that will not tolerate corrupt actions or people in its politics and government.
3. **Tackling corruption matters to the British public:** 68% are concerned about the impact of corrupt actors from abroad on national security, and 59% about the impact on the housing market. Approximately 85% are concerned about the possibility of corruption among public sector employees or politicians.² Tackling corruption matters to British businesses, with 7% of internationally trading UK businesses with employees believing they have lost a business opportunity overseas to competitors offering bribes in the last 12 months.³ Tackling corruption also matters to our reputation, with the UK placing at its lowest ever score of 20th in Transparency International's Global Corruption Perceptions Index in 2024.⁴
4. This strategy seeks to **reduce the harm caused by corruption to growth, security, and democracy in the UK and to UK interests overseas.** We will do this by combatting corrupt actors and funds, tackling vulnerabilities to corruption in the UK, and building global resilience to corruption. We will measure our effectiveness in delivering this change against the outcomes set out in Annex B.
5. **Tackling corruption helps achieve the government's Plan for Change.**⁵ The strategy will improve opportunities for long-term **growth** by promoting fair competition for UK exporters overseas, ensuring the UK's reputation for business integrity supports investment, and strengthening the reputation of our financial services sector. UK businesses support strong action against corruption, and the illicit finance that enables this threat. The strategy will directly address threats to UK **national security**, deploying specialist law enforcement capabilities against corruption, and bearing down on the corrupt funds that fuel national security threats. It will **secure borders** against corrupt actors. Measures to prevent corrupt insiders from working in high-risk public sector bodies will support the **safer streets mission**, increasing public confidence in policing.

1 Corruption is defined as "the abuse of entrusted power for private benefit that usually breaches laws, regulations, standards of integrity and/or standards of professional behaviour." See Annex A.

2 Home Office, UK public's concerns, perceptions and understanding of corruption, 2025, available at: <https://www.gov.uk/government/publications/uk-publics-concerns-perceptions-and-understanding-of-corruption>

3 In the 12-month period prior to the survey. Home Office, Economic Crime Survey 2024, available at: <https://www.gov.uk/government/publications/economic-crime-survey-2024>

4 Transparency International, Corruption Perceptions Index 2024, available at: <https://www.transparency.org/en/cpi/2024>

5 HMG, Plan for Change, December 2024, available at: <https://www.gov.uk/government/publications/plan-for-change>

6. The strategy seeks to restore **trust in UK government and politics**, which the Prime Minister has said is the great test of our era.⁶
7. **This strategy is focused on corruption, but complements and builds on the Economic Crime Plan 2 (ECP2)**, which sets out the UK's broader approach to tackling economic crime, in partnership with the private sector, and covers money laundering, fraud and sanctions evasion. The government will also be publishing a new, expanded Fraud Strategy, and once the ECP2 concludes, a new Anti-Money Laundering and Asset Recovery Strategy (see Annex E).
8. This Anti-Corruption Strategy 2025 has the following aims.
 - **Strengthen enforcement against corruption.**

We will expand the new Domestic Corruption Unit (DCU) in the City of London Police and continue supporting the International Corruption Unit (ICU) and the International Anti-Corruption Coordination Centre (IACCC) in the National Crime Agency (NCA). We will expand the use of sanctions against corrupt actors, scale up our capability to pursue professional enablers, including through increased co-ordination across law enforcement, and take action against insiders in the public sector through screening, information sharing and guidance. We will strengthen border controls to prevent corrupt elites from entering the UK. We will also explore the funding landscape with the aim of strengthening economic crime enforcement. We will seize the opportunities presented by artificial intelligence, including speeding up Serious Fraud Office (SFO) investigations and sharing wider lessons, and piloting a prototype artificial intelligence corruption investigation assistant.
 - **Support industry to prevent and identify corrupt activity.**

We will reform the UK's anti-money laundering and counter-terrorist financing (AML/CTF) supervisory system by consolidating the supervisory functions of 22 professional services supervisory bodies. We will help UK businesses to combat bribery through the SFO's crime prevention capability and a new online anti-bribery resource collection for small and medium-sized enterprises. We will explore opportunities to reform the UK whistleblowing framework, including through potential financial incentives. We will consult on whether to amend the UK's anti-money laundering regulations to respond to emerging risks.
 - **Tackle weaknesses in sectors vulnerable to exploitation by corrupt actors.**

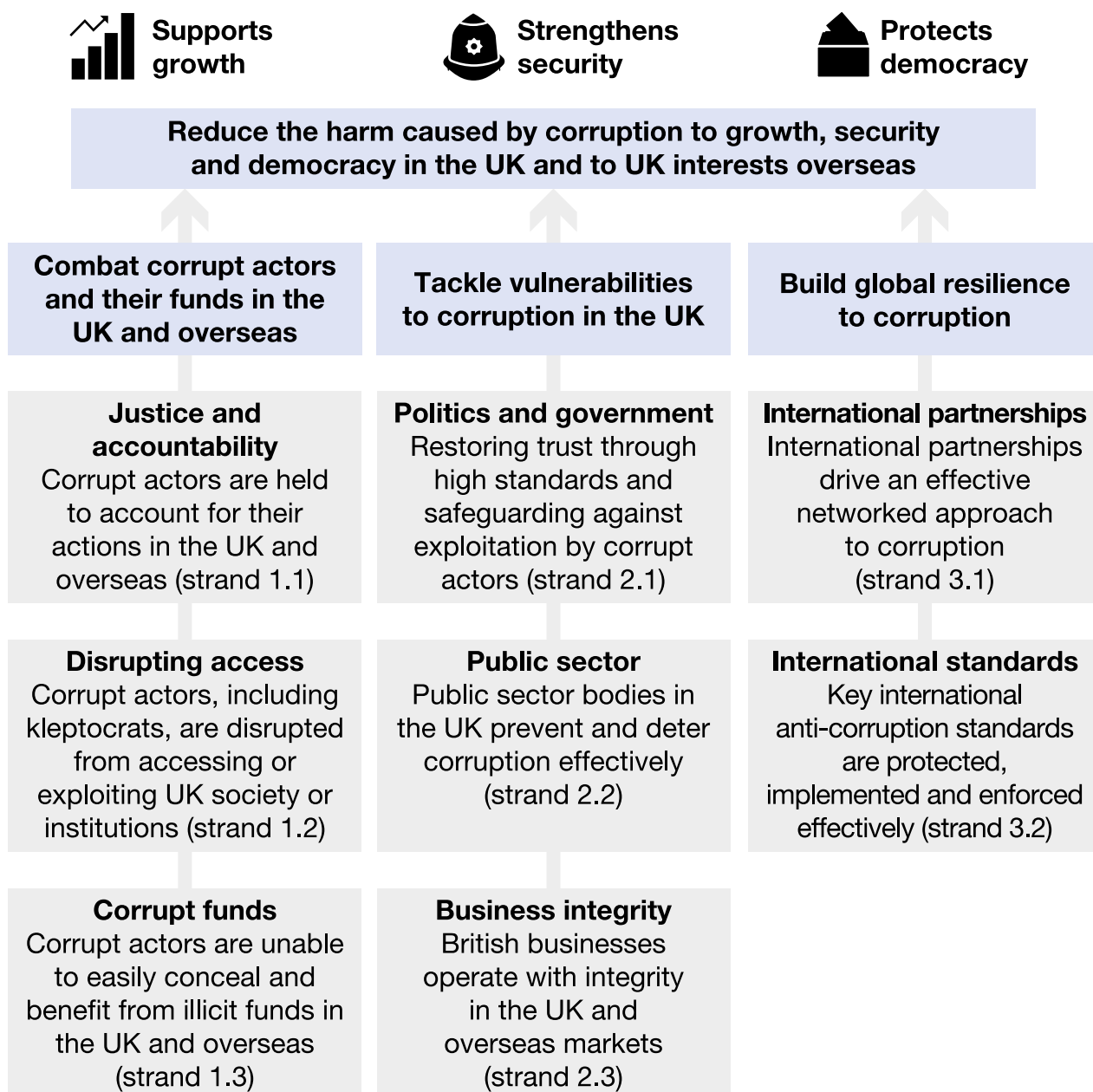
We will support the new Independent Football Regulator to strengthen its anti-corruption capabilities, including enhancing its affiliation with law enforcement. We will strengthen measures to combat Strategic Lawsuits Against Public Participation (SLAPPs), including considering the future approach for tackling all SLAPPs beyond economic crime. We will encourage cultural and civic organisations to strengthen resilience to corruption risks from high-value donations. We will assess how effectively the UK's current financial crime response addresses the threat of kleptocracy, where corrupt elites overseas are often able to effectively legalise their corruption through their role in their home state.

6 HMG, Ministerial Code, 2024, available at: https://assets.publishing.service.gov.uk/media/672b46f5f03408fa7966d1d4/November_2024_-_Ministerial_Code.pdf

- **Restore public trust in the integrity of our institutions.**
We will establish a new Ethics and Integrity Commission to strengthen probity in public life by strengthening and reforming the Committee on Standards in Public Life. We will increase safeguards to protect the UK's political financing framework from exploitation, including introducing new requirements on those receiving political donations to undertake risk assessments. We will introduce a new local government mandatory code of conduct and a new Local Audit Office – two key measures aimed at strengthening integrity and mitigating corruption risks across local government. We will improve corruption training to public sector officials, especially on procurement.
- **Provide strong UK leadership on tackling corruption globally.**
The UK will host a Countering Illicit Finance Summit which will bring together a diverse coalition of countries to tackle illicit finance and corruption. We will expand the UK's overseas illicit finance network and develop new partnerships with emerging and global financial centres to drive an effective, networked approach to tackling corruption. We will work with the Global South to build long-term capacity, and support and protect civil society and investigative journalists. We will defend key global standards through bodies such as the Financial Action Task Force and the Organisation for Economic Co-operation and Development. This includes efforts to strengthen implementation of international asset recovery standards.
- **Increase transparency.**
We will set clear expectations for when we expect the Crown Dependencies (CDs) and Overseas Territories (OTs) to introduce enhanced registers of beneficial ownership transparency, if they have not already done so, including introducing expansive access for those with a legitimate interest as an interim step, as part of wider UK leadership on this issue. In the UK, the Anti-Corruption Champion will lead a government review of asset and beneficial ownership in the UK to identify vulnerabilities that can be exploited by criminals, and produce recommendations on how these can be addressed.

9. **Effective implementation will be key to delivering our ambition.** We are committed to providing transparent updates on our progress, including to Parliament. We will seek to deliver in partnership with civil society, academics, parliamentarians and the private sector where possible. This will be actively supported by the Prime Minister's Anti-Corruption Champion. We will seek to improve the corruption evidence base, including through the new UK policy definition of corruption.

Figure 1: Summary of the UK anti-corruption response



Introduction

10. The aim of the strategy is to **reduce the harm caused by corruption to growth, security, and democracy in the UK and to UK interests overseas** over the next five years. This means:
 - combatting corrupt actors and funds in the UK and overseas (pillar 1)
 - tackling vulnerabilities to corruption in the UK (pillar 2)
 - building global resilience to corruption (pillar 3)
11. These three pillars are underpinned by a cross-cutting implementation strand on evidence, transparency and oversight.
12. The **domestic and global context** has changed significantly over the last decade. Public trust in the ability of governments to deliver for their citizens has fallen. As the National Security Strategy shows, the global economic and security outlook is becoming characterised by radical uncertainty.⁷ Russia's illegal war against Ukraine has highlighted the malign impact corrupt regimes can have on the UK and our allies. Further advances in technology, such as artificial intelligence, have the potential to facilitate new forms of crime including corruption, but also become a means to tackle it more effectively.
13. This strategy **builds on progress made over the past 20 years** by different UK governments, frequently with strong cross-party support. This includes the introduction of the Bribery Act 2010; the establishment of the multi-country IACCC, housed at the NCA; the introduction of innovative tools like Account Freezing Orders and Unexplained Wealth Orders which help identify the suspected proceeds of corruption; and the passing of legislation to strengthen the UK's company register and increase the transparency around who owns property and companies in the UK.
14. This government has **already announced a further series of measures** since it was elected in July 2024 which demonstrate its commitment to tackling corruption. These include:
 - the Prime Minister appointing Baroness Margaret Hodge as the UK's new Anti-Corruption Champion⁸
 - establishing a new DCU pilot within the City of London Police⁹
 - innovative use of sanctions against kleptocrats and their enablers, making the UK a more hostile environment for corrupt actors
 - a UK-hosted Countering Illicit Finance Summit

7 Cabinet Office, National Security Strategy 2025: Security for the British People in a Dangerous World, 2025, available at: <https://www.gov.uk/government/publications/national-security-strategy-2025-security-for-the-british-people-in-a-dangerous-world/national-security-strategy-2025-security-for-the-british-people-in-a-dangerous-world-html#pm-foreword>

8 The Rt Hon Baroness Margaret Hodge DBE, see: <https://www.gov.uk/government/people/margaret-hodge>

9 Home Office, Working with partners to defeat economic crime, 2024, available at: <https://www.gov.uk/government/speeches/working-with-partners-to-defeat-economic-crime>

- new immigration measures in February 2025 targeted at Kremlin-linked elites¹⁰
- improved standards and integrity in politics, with a new Ethics and Integrity Commission, an updated Ministerial Code, stronger role for the Independent Adviser on Ministerial Standards, and new guidance on gifts and hospitality
- an Independent Football Regulator introduced by the Football Governance Act to protect football against unsuitable owners

The Countering Illicit Finance campaign

In November 2024, the then Foreign Secretary launched the Countering Illicit Finance campaign. The campaign focused on demonstrating UK global leadership in tackling the shared vulnerabilities that enable illicit finance and corruption, and the harms they produce. The UK will also host a Countering Illicit Finance Summit.

The campaign has provided significant momentum and direction to this government's efforts on tackling the shared threats from illicit finance and corruption, and its priorities have been integrated throughout this strategy. This includes measures to:

- reduce financial secrecy
- restrict professional enablers who facilitate the laundering of corrupt or illicit funds
- hold kleptocrats to account
- drive reform in global financial centres
- reduce harms to development caused by illicit finance and corruption

Combining domestic reform with global leadership will be essential to success in tackling the transnational threats of corruption and illicit finance; an approach which has been embraced throughout this strategy.

15. This strategy sets out a whole-of-government response to corruption at a local, national and international level. This strategy will be delivered in close partnership with civil society, academics, the private sector and other key external partners, in particular on tackling corrupt funds, improving business integrity, hosting the UK Countering Illicit Finance Summit, and protecting international standards overseas. We plan to provide regular updates to partners via an external contact group chaired by the Anti-Corruption Champion.
16. This strategy will have material outcomes for all four nations of the UK. Northern Ireland, Scotland, and Wales have considerable levels of legislative, administrative, and budgetary autonomy, including in areas relevant to this strategy (e.g. local government and procurement by devolved bodies). As a result, some areas of this strategy will apply to England only, while others will have a broader scope.

10 HMG, 'Kremlin-linked elites face exclusion from UK', February 2025, available at: <https://www.gov.uk/government/news/kremlin-linked-elites-face-exclusion-from-uk>

Corruption problem

17. Corruption damages the UK and its citizens directly. It makes British people poorer, less safe, and it undermines democracy. It makes society and the economy less competitive and less fair, and is a roadblock to economic growth. It damages our reputation for integrity and so undermines confidence in our institutions and business. Corruption is a transnational security challenge which fuels instability and state capture and increases threats back into the UK, including from kleptocrats, criminals and hostile states.^{11,12}
18. The strategy sets out the first UK government policy definition of corruption, developed in collaboration with the University of Sussex (see below). This recognises that although corruption in the UK and overseas is usually illegal and subject to law enforcement action, some corrupt activity is related to breaches of regulations, standards of integrity, and/or professional behaviour which may not be illegal. As a policy definition, it is not intended to have any legal application. See Annex A for explanatory notes and further detail on the intended use of this definition.

UK definition of corruption

Corruption is the abuse of entrusted power for private benefit that usually breaches laws, regulations, standards of integrity and/or standards of professional behaviour.

19. In common with other countries, it is difficult to quantify the overall scale of the corruption threat to the UK.¹³ The hidden nature of corruption makes it hard to uncover, and reliable data is challenging to obtain and analyse. There are also challenges in directly assessing the harms it causes, beyond its indirect or secondary impact on public trust, weakened institutions, and misuse of funds. While high-level perception and composite indicators can be useful in telling us what people think about the corruption problem, they don't tell us about its actual scale or nature. We do know that only a small proportion of corruption is detected and prosecuted, and that corruption causes harm to the UK's economy, security, and democracy.^{14,15}

11 See for example, Allison, O., Lewis, D., Looting Mariupol: Russia's use of illicit finance and economic crime in Ukraine, SOC ACE Research Paper No 35, University of Birmingham, 2025, available at:

<https://www.socace-research.org.uk/publications/looting-mariupol>

12 See Hellman J. S., Jones G., Kaufmann D., Seize the state, seize the day: State capture, corruption, and influence in transition, The World Bank, 2000.

13 University of Sussex, Centre for the Study of Corruption, International approaches to recording corruption and monitoring intervention outcomes at the national level, available at: <https://www.gov.uk/government/publications/international-approaches-to-recording-and-monitoring-corruption>

14 117,000 bribes were offered to UK businesses with employees by other UK businesses or individuals over a 12-month period. Home Office, Economic Crime Survey 2024, available at: <https://www.gov.uk/government/publications/economic-crime-survey-2024>

15 HMG, UK Bribery Act 2010, available at: <https://www.legislation.gov.uk/ukpga/2010/23/contents>

Corruption makes us poorer

20. Corruption harms long-term sustainable growth. The costs of corruption means that everyone loses in the long-term – through lower investment, higher business costs, and an economy built on unfairness and a lack of opportunity for all – outweighing any apparent short-term benefits.¹⁶
21. Every UK company that loses market access because of corrupt officials accepting bribes, or a foreign investor put off by a perception that tackling corruption doesn't matter in the UK, means fewer jobs, less income and less money for public services. Protecting the integrity of the UK financial system, and providing a clean, safe and attractive place to invest, strongly supports economic growth and financial stability.
22. Bribery is considered to be the most common form of corruption globally.¹⁷ It undermines fair competition by restricting access to new markets or government contracts. The costs of bribery for businesses can be high, with any individual gains short-term, often unsustainable, and offset by wider damage to fair competition. The Home Office (HO) Economic Crime Survey 2024 showed that approximately 1 in every 35 businesses with employees encountered a bribery incident in the previous 12 months, with businesses offered an estimated total of 117,000 bribes by other UK businesses or individuals, cumulatively worth over £300 million. Enforcement data indicates that in 2024, defendants were prosecuted for a total of 15 offences under the UK Bribery Act 2010.¹⁸ A recent example is the conviction of four construction managers for bribery offences relating to labour contracts worth over £15 million between 2012 and 2018. They were sentenced to a collective 11 and a half years of imprisonment.¹⁹
23. Corrupt actors laundering their illicit wealth in the UK makes the UK poorer by harming our reputation as a place for legitimate business in the long-term. Through using their illicit funds to purchase property and businesses, corrupt actors can also distort local market conditions and increase everyday costs for British people.²⁰ Of the public, 60% are concerned about the impact of corrupt actors from abroad on UK infrastructure projects, and 59% about their impact on the housing market.²¹ Bringing corrupt actors to justice reinforces the UK's commitment to the rule of law which safeguards economic growth in the long-term.²² The NCA assesses it is a realistic possibility that over £100 billion is laundered every year through the UK or through UK corporate structures

16 See Nur-tegin, K. and Jakee, K., Does corruption grease or sand the wheels of development? New results based on disaggregates data, *The Quarterly Review of Economics and Finance*, 2020, 75, pages 19-30.

17 For further explanation on bribery see, Barrington, R., David-Barrett, E., Dobson Phillips, R. and Garrod, G., eds., *Dictionary of Corruption*, Agenda Publishing, 2023. For a legal definition of bribery see Sections 1 and 2 of the HMG, UK Bribery Act 2010, available at: <https://www.legislation.gov.uk/ukpga/2010/23/contents>

18 HMG, UK Bribery Act 2010, available at: <https://www.legislation.gov.uk/ukpga/2010/23/contents>, and Ministry of Justice, Criminal Justice System statistics quarterly: December 2024, available at: <https://www.gov.uk/government/statistics/criminal-justice-system-statistics-quarterly-december-2024>

19 Construction Enquirer News, 'Former Keltbray managers jailed after corruption trial', 2025, available at: <https://www.constructionenquirer.com/2025/04/28/four-jailed-after-keltbray-corruption-trial/>

20 U4, Illicit financial flows and economic growth, available at: <https://www.u4.no/publications/illicit-financial-flows-and-economic-growth/fullversion>

21 Home Office, UK public's concerns, perceptions and understanding of corruption, 2025, available at: <https://www.gov.uk/government/publications/uk-publics-concerns-perceptions-and-understanding-of-corruption>

22 Fernandes, M. and Jančová, L., Stepping up the EU's efforts to tackle corruption: Cost of Non-Europe Report, European Parliamentary Research Service, European Parliament, 2023, available at: [https://www.europarl.europa.eu/RegData/etudes/STUD/2023/734687/EPRS_STU\(2023\)734687_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2023/734687/EPRS_STU(2023)734687_EN.pdf)

using high-end money laundering methods.²³ As an example of this, a corrupt politician James Ibori, former Governor of Delta State in Nigeria, was sentenced to 13 years imprisonment in the UK for defrauding his state of nearly £50 million and funding a lavish lifestyle with properties and luxury cars in London, Washington DC, and Texas.²⁴

24. Corruption and illicit finance are a drag on global growth. They distort international markets, deter legitimate investment and weaken financial stability. In Africa alone, it is estimated that at least US\$50 billion annually is lost to illicit finance.²⁵ Wherever it occurs, corruption can divert funds away from growth-stimulating investments. This reduces the resources available for critical development projects, undermines confidence in the business environment, increases compliance costs and reduces legitimate firms' access to credit.

Corruption makes us less safe

25. Every corrupt insider who assists organised criminals in evading UK border controls, or lawyer or accountant who helps kleptocrats hide their corrupt funds, is playing a role in increasing crime, and empowering those who seek to cause harm to the UK and its citizens.
26. Corrupt immigration officials make the UK's streets less safe for the public. Insiders enable serious and organised crime by disclosing sensitive information, facilitating the movement of drugs or undermining immigration controls which keep the public safe.²⁶ Corrupt caseworkers who provide visas to individuals in exchange for favours, or undermine enforcement visits, damage the integrity of our immigration system. This places the public at risk by allowing dangerous individuals, including foreign national offenders, to remain in the UK. Recent examples include a corrupt border official jailed for allowing drugs through a checkpoint at Portsmouth Port, and an immigration official granting asylum applications in return for bribes.^{27,28}
27. Corrupt police and prison officers benefit criminals and harm the public they should be serving. They undermine trust in uniformed services in the UK which rely on public trust and confidence to operate effectively. In 2024, 45 staff working within HM Prison and Probation Service were prosecuted for corruption-related offences.²⁹ Each of these individuals breached the trust placed in them and risked public safety for their own gain.

23 National Crime Agency, National Strategic Assessment of Serious and Organised Crime, 2025, available at: <https://www.nationalcrimeagency.gov.uk/nsa-2025>

24 BBC News, 'Former Nigeria governor James Ibori jailed for 13 years', 2012, available at: <https://www.bbc.co.uk/news/world-africa-17739388>

25 United Nations, Economic Commission for Africa, 'Illicit financial flows: report of the High-Level Panel on illicit financial flows from Africa', 2015, available at: <https://repository.uneca.org/entities/publication/b49325f9-4396-5882-8d56-88117f079086>

26 National Crime Agency, National Strategic Assessment of Serious and Organised Crime, 2025, available at: <https://www.nationalcrimeagency.gov.uk/nsa-2025>

27 BBC News, 'Corrupt Portsmouth border officer jailed for aiding drugs gang', 2024, available at: <https://www.bbc.co.uk/news/articles/ck77vzz2lxo>

28 BBC News, 'Blackburn Home Office worker granted asylum applications for cash', 2025, available at: <https://www.bbc.co.uk/news/articles/cvg8emkley3o>

29 Corruption-related offences in this context include misconduct in public office, conspiracy to convey, and Section 40D communication offences. HMPPS Counter Corruption Unit internal figures.

28. Corruption threatens the integrity of the global defence sector and therefore has the potential to fuel conflict and increase risks back to the UK.³⁰ There is strong evidence to suggest that the defence sector is vulnerable to exploitation by corrupt actors, given the inherent secrecy and complexity of the sector.³¹ These links are especially true in countries experiencing state capture, as control of the security sector is one of the main targets for corrupt elites.³² This risk has the potential to increase in coming years as countries in Europe and elsewhere increase defence and security-related spending in response to growing levels of conflict.
29. Corruption undermines security and stability overseas. It prevents effective and capable governance from taking root in countries that matter to the UK and can fuel state capture. This creates conditions that undermine almost all UK interests, including the effective use of official development assistance and the UK's ability to support those most in need. Perceptions that the UK is not tackling corruption at home undermine our global reputation and ability to influence others to tackle corruption. Corruption fuels instability which can make it easier for organised criminals, terrorists and kleptocrats to operate, and is one of the drivers of irregular migration. When criminal actors bribe officials to overlook their illegal small boat operations, or corrupt administrators deny aid to deserving recipients, the most vulnerable are impacted, including by encouraging individuals to put their lives at risk on dangerous journeys to Europe, including the UK.

Corruption makes us less democratic

30. Every political leader that disregards integrity standards in public life, or public official that trades services and influence for their own benefit, means lower trust in democracy and weaker public services. And every kleptocrat that gains access to the UK's own elites by laundering their reputation undermines and weakens our institutions.³³ The UK has traditionally prided itself on being a country that will not tolerate corrupt actions or people in its politics and government, and we need to ensure that we do not lose this reputation.
31. Corrupt actors from overseas seeking political influence in the UK serve their own interests, not those of British voters or our democracy. Parliament's Intelligence and Security Committee has found that foreign elites involved with charitable or political organisations in the UK have donated to political parties.³⁴

30 Transparency International Defence and Security, 'Transparency International Exposes Corruption's Hidden Role in Global Weapons Diversion in New Report', 2025, available at: https://ti-defence.org/publications/under_the_radar_publication/

31 Transparency International Defence and Security, Sabotaging Peace: Corruption as a threat to international peace and security, 2025, available at: <https://ti-defence.org/wp-content/uploads/2025/06/Corruption-as-a-threat-to-peace-and-security.pdf>

32 Transparency International Defence and Security, Trojan Horse Tactics: Unmasking the imperative for transparency in military spending, 2024, available at: <https://ti-defence.org/publications/trojan-horse-tactics-transparency-military-spending-corruption-risk/>

33 Heathershaw, J., Pelec, T. and Mayne, T., Indulging Kleptocracy: British Service Providers, Postcommunist Elites, and the Enabling of Corruption, 2025, Oxford University Press, available at: <https://global.oup.com/academic/>

34 Intelligence and Security Committee of Parliament, HC 632 – Intelligence and Security Committee of Parliament – Russia, 2020, available at: https://isc.independent.gov.uk/wp-content/uploads/2021/01/20200721_HC632_CCS001_CCS1019402408-001_ISC_Russia_Report_Web_Accessible.pdf

32. Corrupt local officials damage local communities. They undermine trust in local institutions as power is being devolved. Any perception that local councillors or officials don't maintain high standards of integrity and conduct undermines public trust too. Although the evidence is largely anecdotal, law enforcement partners assess local government as a key sector exposed to corruption risk in the UK.³⁵ An example is a former council worker who was imprisoned in 2024 for accepting bribes from a local company to inflate invoices, using money which should have funded services in the local community.³⁶
33. Corrupt companies securing contracts via unfair public procurement processes means poorer services and value for the taxpayer. As well as penalising companies playing by the rules, unfair procurement damages public trust in government and the award of public funds. Although evidence of corruption in public procurement is largely anecdotal, the scale of risk is substantial given £400 billion is awarded through government contracts each year.³⁷ The Covid Counter-Fraud Commissioner is working to recoup significant amounts of public money lost in pandemic-related fraud.

35 Ministry of Housing, Communities and Local Government, Local government procurement: fraud and corruption risk review, 2020, available at: <https://www.gov.uk/government/publications/local-government-procurement-fraud-and-corruption-risk-review>

36 Crown Prosecution Service, Former council employee jailed after roofing work fraud, 2024, available at: <https://www.cps.gov.uk/cps/news/former-council-employee-jailed-after-roofing-work-fraud-0>

37 Ministry of Housing, Communities and Local Government, Review into the risks of fraud and corruption in local government procurement, 2020, available at: https://assets.publishing.service.gov.uk/media/5ede321ce90e073a07056d08/Fraud_and_corruption_risks_in_local_government_procurement_FINAL.pdf

Pillar 1:

Corrupt actors

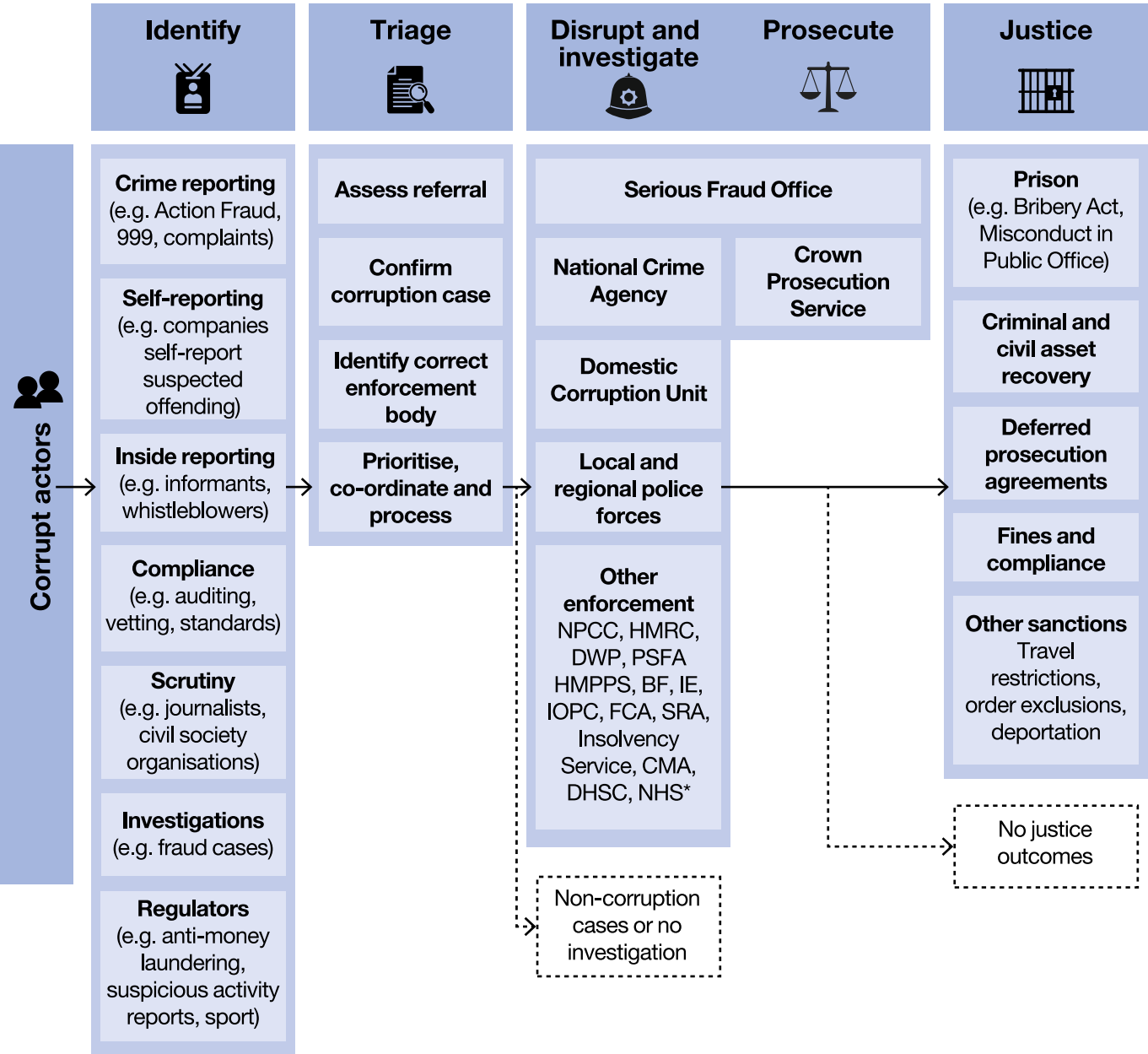


Pillar 1: Corrupt actors

Combat corrupt actors and their funds in the UK and overseas (Objective 1)

34. The first pillar of the strategy seeks to combat corrupt actors and their funds in the UK and overseas. To do this we will focus our response on **justice and accountability, disrupting access to the UK, and tackling corrupt funds.**

Figure 2: Overview of the UK system for bringing corrupt actors to justice



* NPCC: National Police Chiefs’ Council. HMRC: HM Revenue and Customs. DWP: Department for Work and Pensions. PSFA: Public Sector Fraud Authority. HMPPS: HM Prison and Probation Service. BF: Border Force. IE: Immigration Enforcement. IOPC: Independent Office for Police Conduct. FCA: Financial Conduct Authority. SRA: Solicitors Regulation Authority. CMA: Competition and Markets Authority. DHSC: Department of Health and Social Care. NHS: National Health Service.

1.1: Justice and accountability

Corrupt actors are held to account for their actions in the UK and overseas (Outcome 1.1)

35. The effectiveness of the UK's response to corruption depends not only on its ability to bring corrupt actors to justice, but also on the credibility of its broader enabling environment – encompassing prevention, transparency, enforcement capacity, and sustained political commitment. Tactically, this calls for a system that can identify corruption at an early stage, efficiently triage new cases, and ensure that enforcement bodies are well-resourced and operate effectively within the justice system. Corruption cases are often particularly challenging to investigate and prosecute successfully: the crimes are typically concealed, the cases can be complex and protracted, and investigations frequently span multiple international jurisdictions.³⁸
36. To hold corrupt actors to account for their actions in the UK and overseas successfully, we will focus our response on **identification and referrals, enforcement, and justice**.

Identification and referrals

Potential corrupt activity is identified early with referrals triaged and co-ordinated effectively by enforcement agencies (Outcome 1.1a)

37. There are inherent challenges with identifying hidden crimes such as corruption. Potential referrals are often not recorded as corruption because of overlaps with fraud or other types of crime, and it is not always easy to know where to report corruption. Once reported, corruption referrals need to be triaged and prioritised between the main law enforcement agencies to ensure the highest harm cases are investigated effectively.
38. Whistleblowers are one of the most effective assets in identifying wrongdoing, as they often witness corrupt behaviour from the inside and can prevent further harm early.^{39,40} However, there are concerns that the current UK framework of legal protections for whistleblowers in the Employment Rights Act 1996, first introduced in 1998, may not be operating as effectively as it should be. Arguments have also been made for more UK regulators to pay corporate whistleblowers to report wrongdoing, in light of

38 UNODC, Practical Guide on the Investigation of Corruption Cases, 2024, available at: https://track.unodc.org/uploads/documents/corruption/Publications/2024/UNODC_2024_Practical_Guide_on_the_Investigation_of_Corruption_Cases.pdf

39 HMG, Public Interest Disclosure Act 1998, available at: <https://www.legislation.gov.uk/ukpga/1998/23/contents>

40 Transparency International, Internal Whistleblowing Systems: Best practice principles for public and private organisations, 2022, available at: <https://www.transparency.org/en/publications/internal-whistleblowing-systems>

evidence from other countries that such programmes are reaping increased actionable intelligence on corrupt activities and enhancing law enforcement outcomes.^{41,42}

39. Our ambition is for potential corrupt activity to be identified early, and referrals to enforcement agencies triaged and co-ordinated effectively. We will design and implement activities over the next five years to meet this ambition, and have initially agreed the following commitments.
- I. Review the current system for **reporting potential corruption** within the UK to identify ways to make this easier and better co-ordinated, including better alignment with existing economic crime referral systems (JACU) (priority commitment).
 - II. Expand the **National Economic Crime Centre (NECC) Bribery and Corruption clearing house** to provide robust deconfliction and tactical oversight of the most significant corruption cases in the UK, including a single approach to risk scoring, a register of cases and case reporting every six months (NECC, NCA, JACU) (priority commitment).⁴³
 - III. Consider the findings of the Independent Review of Disclosure and Fraud Offences (part two) which includes the **incentivisation of whistleblowers in economic crimes**, and assess the feasibility of introducing financial incentive schemes and support for individuals reporting economic crime (HO, JACU, SFO, HMT, FCDO, DBT, PSFA) (priority commitment).
 - IV. Explore opportunities to **reform the UK's approach to whistleblowing** in the employment context (DBT) (priority commitment).

Enforcement

Enforcement agencies investigate corrupt actors effectively to prevent harm to victims, the UK and its interests overseas (Outcome 1.1b)

40. The UK deploys dedicated teams in the NCA, SFO and City of London Police (CoLP) to tackle corruption and recover assets in the UK and overseas. Since its inception, the NCA-led IACCC has received over 347 requests for assistance on grand corruption investigations, and as a result has identified over £1.8 billion of hidden stolen assets and directly supported the freezing of £641 million.⁴⁴ Law enforcement agencies also focus on: prevention work with companies, deterrence and disruption activity, and other means

41 In 2024 to 2025, the SFO Intelligence Division received approximately 1,450 referrals, all of which were triaged, assessed and processed. Of those, the SFO Intelligence Division managed 167 whistleblowing disclosures, as defined by Section 230(3) of the Employment Rights Act 1996, and/or 'making a disclosure in the public interest'. SFO Annual Report and Accounts 2024/25, available at: <https://www.gov.uk/government/publications/sfo-annual-report-and-accounts-2024-25>

42 SOC ACE, The Role of Financial Rewards for Whistleblowers in the Fight Against Economic Crime, 2024, available at: <https://www.socace-research.org.uk/publications/socace-rp31-the-role-of-financial-reward-programmes-for-whistleblowers-in-the-fight-against-economic-crime>

43 Includes all Priority 1 and Priority 2 cases, excluding all internal corruption cases within law enforcement and policing. Priority 1 case: A threat or criminal activity impacting on an international scale. Priority 2 case: A threat or criminal activity impacting on a national or international scale.

44 Key statistics computed from IACCC since its inception in July 2017 to December 2024.

of holding corrupt actors to account, including through deferred prosecution agreements. There are also several other public sector organisations in the UK which investigate corrupt activity including the HO, Independent Office for Police Conduct (IOPC) and HM Revenue and Customs (HMRC).

41. There are challenges for all law enforcement teams in investigating corruption cases. The complexity and length of cases means agencies manage a relatively small number of potentially high-harm cases, with low capacity to flex to new cases or emerging areas of risk. In common with wider economic crime, there are challenges around recruitment and retention of staff due to the demand for specialist financial skills also sought by the financial sector, public and private regulators, commercial advisors and banking divisions. Building on recent investment in new domestic capabilities, the government will explore the funding landscape with the aim of strengthening economic crime enforcement.

Case study: Domestic Corruption Unit

In 2024, CoLP, with support from HO's Joint Anti-Corruption Unit (JACU), launched the pilot DCU. The DCU was established to enhance the UK's ability to understand and respond to the threat of domestic corruption. Its core objectives are to:

- build a dedicated intelligence and investigative capability
- improve insight into the nature and scale of domestic corruption
- support regional and local police forces in progressing corruption cases



In its first year of operation, the DCU assembled a specialist team of investigators and intelligence officers. The unit has processed over 70 referrals across a range of sectors, with referral numbers continuing to rise as the pilot becomes more embedded in the national response. This has led to increased operational activity, including arrests, and has strengthened the UK's overall corruption policing capability to disrupt and bring offenders to justice.

The DCU works closely with policing, prosecutorial and enforcement partners in the UK to tackle corruption and reduce harm, including with Regional Organised Crime Units (ROCU). This operational co-ordination ensures new corruption cases are identified swiftly, and corrupt actors are rigorously pursued at both regional and national levels.

42. Our ambition is that enforcement agencies investigate corrupt actors effectively to prevent harm to victims, the UK, and its interests overseas. We will design and implement activities over the next five years to meet this ambition, and have initially agreed the following commitments.
- I. Expand the **DCU** to investigate national and regional corruption cases in the UK, focusing on key at-risk sectors, and supporting ROCUs' and local forces' cases (JACU, CoLP) (priority commitment).⁴⁵
 - II. Continue support for the NCA's **ICU** and strengthen collaboration with the unit's partner countries on investigations to improve evidence (FCDO, NCA) (priority commitment).
 - III. Continue support for the **IACCC** so it has a larger UK law enforcement membership and can raise its profile in international fora, and increase resourcing and members from other countries (FCDO, NCA) (priority commitment).
 - IV. In the context of Spending Review 2025, **explore the funding landscape** with the aim of strengthening economic crime enforcement (HMT, HO) (priority commitment).
 - V. Speed up the SFO's investigations, through a more efficient investigative process and the use of **artificial intelligence and machine learning**, and share wider lessons learned that could be adopted and integrated across the system (SFO) (priority commitment).
 - VI. Pilot a prototype **artificial intelligence corruption investigation assistant** to improve support for operational delivery in ROCUs and local forces on local corruption cases (JACU, CoLP, CoP, ROCUs).⁴⁶
 - VII. Co-ordinate **law enforcement communications** activity to raise awareness with individuals and industry to protect against future corruption risks (NECC).
 - VIII. Develop a training and support package for low-income countries on the use of **international co-operation** tools in anti-corruption cases (FCDO, UKCA).⁴⁷
 - IX. Deliver the **new international anti-corruption prosecutorial taskforce** to develop an enhanced operational partnership between the SFO and its key international partners (SFO).
 - X. Pursue strengthened enforcement through the **Public Sector Fraud Authority's (PSFA) Enforcement Unit Pilot** by investigating public sector fraud on behalf of public authorities and referring bribery and corruption cases to relevant agencies, subject to powers granted under the Public Authorities Fraud, Error and Recovery Bill (PSFA).⁴⁸

45 The DCU operates within the legal jurisdiction of England and Wales.

46 Priority 3 cases – A threat or criminal activity impacting on a regional or national scale.

47 Home Office, MLA guidelines for authorities outside of the UK, 2023, available at: <https://www.gov.uk/government/publications/mla-guidelines-for-authorities-outside-of-the-uk>

48 Except for HMRC and the Department for Work and Pensions who have their own in-house capabilities to deploy.

Justice

Corrupt actors are brought to justice in a proportionate and timely way (Outcome 1.1c)

43. The rising backlog in the courts has led to delays which risks victims and witnesses becoming disengaged and cases collapsing, undermining the deterrent effect of the law. Fundamental reform is necessary to bear down on the court backlog. Sir Brian Leveson has published the first part of his Independent Review of the Criminal Courts.⁴⁹ The government will carefully consider his proposals and provide a formal response.
44. The justice system needs to work effectively with law enforcement partners to bring corrupt actors to account. There is currently no specific corruption offence set out in UK law, making it difficult to determine easily whether offences are corruption or not.⁵⁰ Economic crimes are complex and often take considerable time to come to trial due to the size and length of the case. Pursuing all reasonable lines of enquiry, and gathering and disclosing evidence appropriately, is time-consuming and requires significant court time to hear bailed cases, which contributes to delays.⁵¹
45. Internationally, a wide range of factors can undermine efforts to hold corrupt actors to account, including weak or captured judicial systems, capacity constraints across law enforcement and criminal justice systems, and insufficient access to information to underpin prosecutions. The UK will participate actively in international dialogues focused on holding corrupt actors to account, including considering the value of an International Anti-Corruption Court.
46. Our ambition is that corrupt actors are brought to justice in a proportionate and timely way. We will design and implement activities over the next five years to meet this ambition, and have initially agreed the following commitments.
 - I. Subject to the government's response to the Independent Review of Disclosure and Fraud Offences 'Disclosure in the Digital Age', we will implement, subject to funding, agreed recommendations to ensure the **disclosure regime** facilitates, not hinders, swift justice including in corruption cases (HO, AGO, MoJ) (priority commitment).
 - II. Scope and launch an **end-to-end review of concluded bribery cases**, to identify common barriers to resolving cases, including reviewing personal consent requirements (JACU, SFO).
 - III. In line with Law Commission recommendations, we will proceed (through the Public Office (Accountability) Bill) to abolish the current common law offence of **Misconduct in Public Office** and replace it with two new statutory offences of breach of duty in public office and seriously improper acts in public office (MoJ).

49 Ministry of Justice, Independent Review of the Criminal Courts, 2024, available at: <https://www.gov.uk/guidance/independent-review-of-the-criminal-courts>

50 Primary legislative tools prosecuting corruption are the Bribery Act 2010, Criminal Justice and Courts Act 2015, and the common law offence: Misconduct in Public Office.

51 Economic crime cases can take 2 to 3 years to be listed for court hearing. Spotlight on Corruption, Back of the Courtroom Queue, 2024, available at: https://www.spotlightcorruption.org/wp-content/uploads/2024/12/SoC_BotCQ_final.pdf

Case study: The International Anti-Corruption Coordination Centre

Since 2018, the IACCC has supported the criminal investigation of the theft of over \$4 billion from the Malaysian sovereign wealth fund. The money was laundered through numerous jurisdictions by criminals within the then Malaysian government, international banking, and private companies.



The IACCC assisted with the identification and freezing of global assets in excess of £300 million, and securing and co-ordinating the delivery of evidence between countries for criminal prosecutions. IACCC advisory activities also supported civil settlements and regulatory fines. Assistance also included Foreign, Commonwealth and Development Office (FCDO) and HO supported training in Malaysia and its regional partners, and the use of NCA specialist investigators from the ICU and Asset Denial teams.

1.2: Disrupting access

Corrupt actors, including kleptocrats, are disrupted from accessing or exploiting UK society or institutions (Outcome 1.2)

47. There are vulnerabilities in our current systems that overseas corrupt elites, including kleptocrats, abuse to gain access to and infect the UK, launder their reputation through UK institutions, and integrate their corruptly obtained wealth into the UK financial system. Kleptocrats are often able to effectively legalise their corruption through their role in their home state, for example through preferential access to government contracts.
48. The presence of kleptocrats in the UK has a corrosive influence and consequently threatens to undermine our foreign policy, development goals, and credibility as a national security actor. There is strong public concern about the impact of foreign corrupt actors on areas of UK life including UK politics, national security, foreign policy, and the housing market.⁵²

Kleptocracy

A kleptocracy is a highly corrupted political regime where power has been consolidated for the benefit of a small elite.

Kleptocrats are a specific type of corrupt elite who subvert domestic political systems to exploit national wealth and resources and steal from the public treasury. Kleptocracy is 'systemic' in that it implies a system where theft is institutionalised and often protected by law enforcement, the judiciary and media control.

49. Corrupt elites benefit from illegitimate wealth converted into legitimacy, alongside influence and protection provided through a network of global services.⁵³ They exploit different sectors to hide assets, control narratives, or gain political and social power by laundering their reputations. Rather than acting alone, these individuals rely on a constellation of professional intermediaries, including reputation managers. Kleptocrats maintain their advantage through the accumulation of wealth,

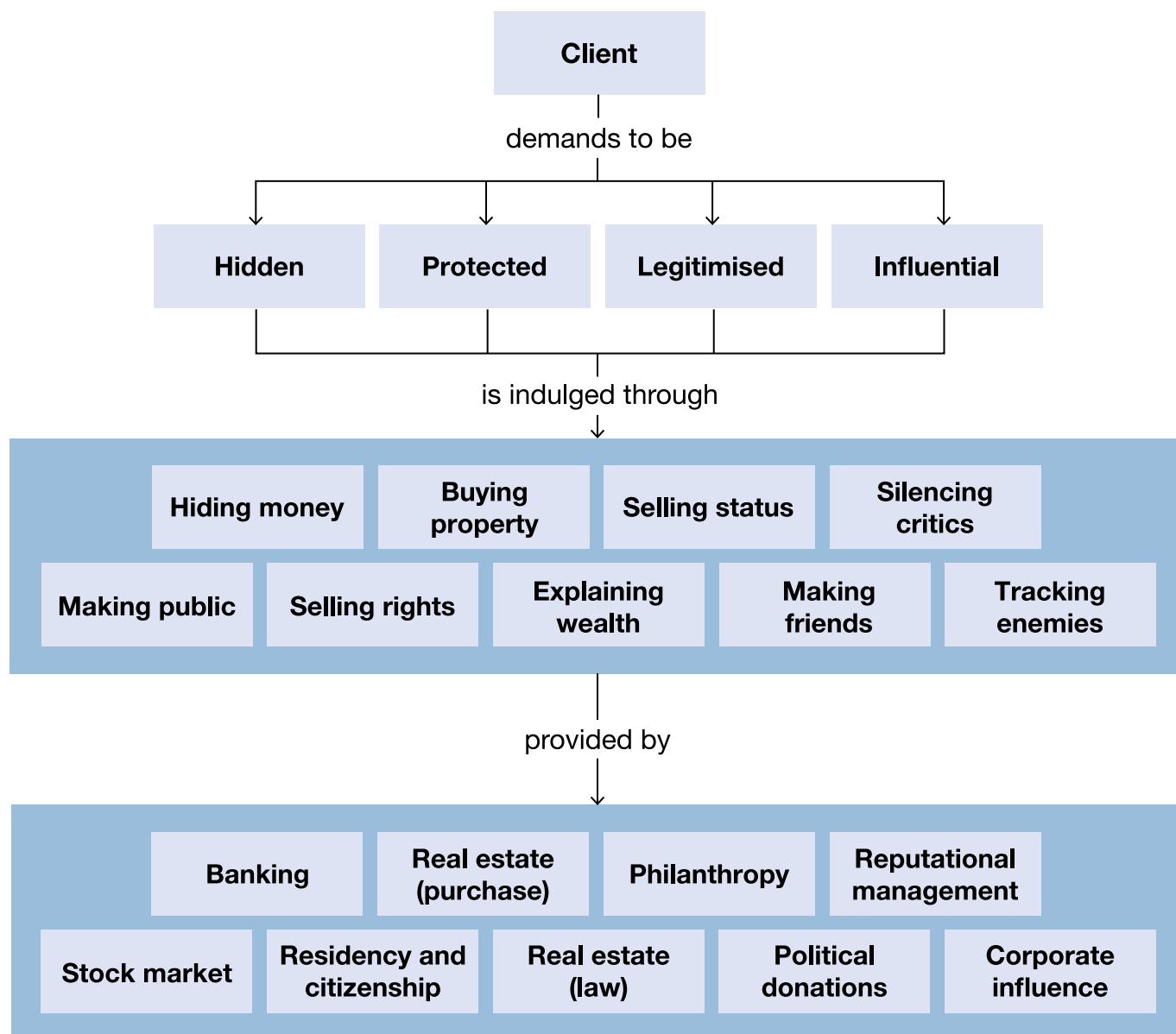
52 73% are concerned about the impact of corrupt actors from abroad on the UK political system, 68% about the impact on UK national security, 67% on UK foreign policy and 59% on the housing market. Home Office, UK public's concerns, perceptions and understanding of corruption, 2025, available at: <https://www.gov.uk/government/publications/uk-publics-concerns-perceptions-and-understanding-of-corruption>

53 Corrupt elites are powerful individuals who have acquired wealth through illicit or unethical means and have legitimised that wealth within their own corrupt or compromised state systems, often by exploiting weak institutions, legal loopholes, or political influence.

combined with strategic access and manipulation of institutions that are legal in nature, translating their private interests into public authority.⁵⁴

50. The relationship between a kleptocrat and the services they receive and rely on in countries like the UK, has been illustrated in the graphic below by UK academics.⁵⁵

Figure 3:



54 The sectors and activities vulnerable to money laundering are not identical to those abused by corrupt elites to launder their reputations in the UK. For instance, public relations firms do not play a direct role in moving or concealing illicit funds in the way that financial system ‘gatekeepers’ such as banks might be abused to do. However, the services they provide can still carry risks when they contribute to protecting or advancing the reputation of a corrupt elite.

55 Graphic reference: Heathershaw, J., Pelec, T. and Mayne, T., *Indulging Kleptocracy: British Service Providers, Postcommunist Elites, and the Enabling of Corruption*, 2025, available at: <https://global.oup.com/academic/product/indulging-kleptocracy-9780197688229?cc=gb&lang=en&>. Reproduced by permission of Oxford University Press. For permission to re-use this material, please visit <https://global.oup.com/academic/rights>

51. To disrupt access of corrupt elites to UK society we will focus on **borders, institutions, and legislation**.

Borders

Corrupt elites are prevented from entering UK borders (Outcome 1.2a)

52. Border security is a key part of our national security toolkit. More effective border controls will help prevent access to the UK from corrupt elites.
53. Our ambition is for corrupt elites to be prevented from entering UK borders. We will design and implement activities over the next five years to meet this ambition, and have initially agreed the following commitments.
- I. Develop improved operational capability to **disrupt corrupt elites and their enablers from accessing the UK**, by integrating and improving the response at the border as our first line of defence, and increasing the capabilities of immigration teams in the HO (HO) (priority commitment).
 - II. Continue to **tackle abuse of residency or citizenship by investment** schemes, which could include introducing visa requirements when necessary, and through upstream international engagement work to reduce the illicit finance risk (HO).
 - III. Consider **enhanced immigration measures** to target corrupt elites and their enablers, on the grounds of protecting national security and combatting corruption (HO).

Institutions

UK institutions are protected against abuse by corrupt elites (Outcome 1.2b)

54. The UK is home to a thriving cultural sector and world-renowned institutions, making them attractive to legitimate investment and philanthropy. However, the sector is also a target for corrupt elites and kleptocrats seeking to secure access and influence in the UK. There is concern amongst the public about the impact of corrupt actors from abroad on key national institutions, including UK cultural institutions, educational institutions and sports organisations and events.⁵⁶

56 53% are concerned about the impact of corrupt actors from abroad on UK educational institutions, 52% on UK sports organisations and events and 42% on UK cultural institutions. Home Office, UK public's concerns, perceptions and understanding of corruption, 2025, available at: <https://www.gov.uk/government/publications/uk-publics-concerns-perceptions-and-understanding-of-corruption>

55. Criminal actors can attempt to launder their reputations through donations to national institutions; donations that may, in part or in full, be funded by wealth of criminal origin.⁵⁷ They also seek to exploit the UK's legal system to avoid legitimate scrutiny of their activities. The government needs to address vulnerabilities to protect our institutions from corrupt elites and kleptocrats, which will ultimately maintain the integrity and attractiveness of our world-leading cultural sector and national institutions.

Corruption in sport: Football regulation

Football is the UK's national game and the most watched sport in the world. In the 2022 to 2023 season, Deloitte's Annual Review of Football Finance estimated that Premier League clubs had a turnover exceeding £6 billion. These factors make football and football clubs an enticing opportunity for legitimate owners and investors.



However, this also makes football an attractive target for malign actors seeking to launder criminal funds or generate illicit gains. The government has therefore included English football clubs and agents in the latest National Risk Assessment of Money Laundering and Terrorist Financing.⁵⁸ This document is the government's stocktake of money laundering and terrorist finance threats facing the UK. It provides further detail on the specific risks and vulnerabilities in the UK football sector with cross-cutting relevance for sectors in scope of the money laundering regulations, and helps regulated sectors to assess and manage these risks accordingly.

56. Our ambition is for UK institutions to be protected against abuse by corrupt elites. We will design and implement activities over the next five years to meet this ambition, and have initially agreed the following commitments.
- I. Implement the economic crime-related **SLAPPs measures** in the Economic Crime and Corporate Transparency Act 2023 (MoJ) (priority commitment).
 - II. Informed by wider evidence available on SLAPPs, consider the future approach for **comprehensively tackling all SLAPPs** (MoJ) (priority commitment).

57 See Annex C of the National risk assessment. Elite: donations to cultural institutions (museums), civic institutions (universities), private schools enrolments, political donations. The result is to legitimise the criminal and allow access to both political and cultural elites of chosen domiciles. HM Treasury, National risk assessment of money laundering and terrorist financing 2025, available at: <https://www.gov.uk/government/publications/national-risk-assessment-of-money-laundering-and-terrorist-financing-2025>

58 HM Treasury, National risk assessment of money laundering and terrorist financing 2025, available at: <https://www.gov.uk/government/publications/national-risk-assessment-of-money-laundering-and-terrorist-financing-2025>

- III. Encourage **national institutions**, including cultural and civic organisations, to strengthen resilience to corruption and illicit finance risks from high-value donations (DCMS, HO, DfE) (priority commitment).
- IV. Support the **Independent Football Regulator** to strengthen its corruption and illicit finance capabilities, including through enhancing the regulator's affiliation with law enforcement (DCMS, JACU) (priority commitment).
- V. Raise **awareness and improve understanding in the UK law enforcement system** of the corruption threat in sport (JACU).
- VI. Engage with bodies and professions within football to promote **higher standards of conduct and compliance** (DCMS, JACU).

Legislation

The UK response to financial crime, including legislation, is equipped to respond to the threat from kleptocracy (Outcome 1.2c)

57. The proceeds of corruption are in scope of the UK's existing criminal finances legislation and anti-money laundering regulatory regime.⁵⁹ However, this legislation is not designed to prevent foreign corrupt elites, who have legitimised their wealth overseas and concealed the initial criminality, from bringing their ill-gotten gains into the UK. The Proceeds of Crime Act 2002 (POCA) includes money laundering offences that cover a wide range of criminal activity, supporting law enforcement to hold those that launder money to account. While POCA was designed to deal with the proceeds of crime, whether domestically or overseas, its ability to combat serious and organised crime is stronger in cases with clear and accessible evidence; whereas kleptocrats effectively shield their wealth from scrutiny through their home countries and make it exceptionally difficult to meet evidentiary thresholds within the UK legal system. International kleptocrats can rely on the following factors for their benefit:
- wealth which may have been obtained from historic crime or corruption (e.g. the 1990s post-Soviet business environment) has been invested in legitimate businesses
 - state-backed explanations as to the source of their wealth if they remain an integral part of that state
 - spouses and other relatives, who may hold assets in their name, have their own seemingly legitimate income streams in their home countries
 - intelligence sharing with authorities in some kleptocracies can be almost non-existent, with a free media often muzzled
 - the threat of substantial legal costs to UK law enforcement agencies
58. While relevant UK laws target the proceeds of corruption and crime more broadly, they fall short when it comes to stopping foreign kleptocrats who smuggle their wealth into the UK under a veil of legitimacy from abroad.

59 POCA, Proceeds of Crime Act 2002, available at: <https://www.legislation.gov.uk/ukpga/2002/29/contents>

59. Our ambition in the strategy is that the UK response to financial crime, including legislation, is equipped to respond to the threat from kleptocracy. Creating more bespoke legislative responses to tackling kleptocracy, while upholding the rule of law in the UK, will take careful consideration, assessment, and consultation. We will also look at the extent to which the UK's use of sanctions addresses this threat as part of this review. We will design and implement activities over the next five years to meet this ambition, and have initially agreed the following commitment.
- I. **Review the effectiveness of the UK's existing efforts to combat kleptocracy**, including our response to financial crime from legislation to enforcement, and the use of sanctions, with any recommendations considered through the appropriate channels (HO, HMT, FCDO) (priority commitment).

Sanctions: Disrupt, deter, demonstrate

Sanctions are a crucial foreign policy tool to help tackle corruption. They support a wide range of objectives, including disrupting access to assets and services in the UK, deterring professional enablers of corruption, and holding corrupt actors to account.⁶⁰ Since the previous strategy, the UK has developed its own sanctions capability, including legislating to set up the thematic Global Anti-Corruption Sanctions regime in 2021. This provides powers to 'designate' individuals and entities involved in serious corruption, applying asset freezes and travel bans.

As well as increasing the scale of our sanctions, we are maximising their impact by identifying corrupt actors with a significant UK nexus and by targeting their wider networks, including those who move and conceal the proceeds of corruption. By exposing the jurisdictions and methods used (such as illicit gold), our sanctions act as a powerful deterrent and galvanise other action, including by exploited sectors. The FCDO is also working in close partnership with countries affected by corruption, particularly those in the Global South, to use sanctions to complement and signal support for their own domestic action against corruption.

This step change was illustrated in last year's announcement of sanctions against a set of notorious 'kleptocrats' who had siphoned wealth from Ukraine, Angola and Latvia for their personal gain, freezing more than an estimated £100 million of London property.

60 Professional enablers are deterred either directly, by making it illegal for professional enablers to support corrupt individuals who have been designated; by designating the enablers themselves; or, more broadly, by showing that professional enablers will be held accountable, thereby disincentivising such behaviour from other enablers.

1.3: Corrupt funds

Corrupt actors are unable to easily conceal and benefit from illicit funds in the UK and overseas (Outcome 1.3)

60. The UK's role as a major financial centre, combined with its relative economic stability and open economy, makes it vulnerable to exploitation by criminals and corrupt actors. The NCA assesses that it is a realistic possibility that over £100 billion is laundered every year through the UK or through UK corporate structures using high end money laundering methods.⁶¹
61. Financial mechanisms that are used to facilitate global trade and legitimate economic activity can also be exploited by those looking to launder corrupt funds, posing direct risks to the UK's security and damaging its reputation. Corrupt funds can be integrated into the formal and informal financial and trade systems by individuals, networks, and institutions. This can be through both complicit action and the exploitation of any vulnerabilities across the counter-economic crime system. Similar vulnerabilities are also used to integrate other forms of criminal cash into the legitimate financial system. In 2025, the NCA's Operation Machinize targeted cash-intensive businesses across England, such as barber shops, vape shops and sweet shops, in a crackdown on cash-based money laundering.⁶²

61 National Crime Agency, National Strategic Assessment of Serious and Organised Crime, 2021, available at: <https://www.nationalcrimeagency.gov.uk/who-we-are/publications/533-national-strategic-assessment-of-serious-and-organised-crime-2021/file>

62 National Crime Agency, 'Operation Machinize: Hundreds of barbershops targeted in NCA-coordinated crackdown', 2025, available at: <https://www.nationalcrimeagency.gov.uk/news/operation-machinize-hundreds-of-barbershops-targeted-in-nca-coordinated-crackdown>

New UK Anti-Money Laundering and Asset Recovery Strategy 2026

The UK aims to tackle money laundering and recover illicit assets through commitments in the ECP2.

These interventions seek to enhance our ability to stop dirty money from being integrated into the financial system and have supported law enforcement's efforts to trace and recover criminal funds. We have also made important legislative changes and introduced a new Economic Crime Levy that is raising over £100 million per year to bolster the capacity and capability of the UK's system-wide response to illicit finance.⁶³

Some measures in ECP2 are targeted at tackling corrupt funds. We are:

- **limiting the abuse of corporate structures**, through delivering reforms to Companies House and improving transparency in relation to UK companies and partnerships
- delivering an **uplift of 475** full-time equivalents across threat leadership, intelligence and investigative and prosecution capacity dedicated to tackling money laundering and asset recovery
- creating an expanded **Combatting Kleptocracy Cell** using the NCA's expertise to target corrupt elites, their money, and their enablers

There are, however, further improvements to be made to the way the UK tackles the dynamic and evolving threat of illicit finance, and its impact on threats such as corruption. Following the conclusion of ECP2 next year, to deliver these improvements, the UK will publish a new UK Anti-Money Laundering and Asset Recovery Strategy in 2026.

Recognising that the Anti-Money Laundering and Asset Recovery Strategy is not yet published, we have committed to a set of immediate actions in this strategy to specifically tackle the laundering of corrupt funds and ensure greater sustainability for critical law enforcement capabilities.

62. To ensure that corrupt actors are unable to easily obscure, move and benefit from illicit funds in the UK and overseas, we will focus on **transparency of ownership, international asset recovery, and professional enablers**.

63 Economic Crime (Transparency and Enforcement) Act 2022, and Economic Crime and Corporate Transparency Act 2023.

Transparency of ownership

Opportunities to obscure corrupt funds through complex ownership structures are substantially reduced (Outcome 1.3a)

63. In order to conceal their identities and launder illicit funds, corrupt actors set up complex corporate structures using shell and front companies across multiple jurisdictions, often involving trusts or trust like arrangements, for which ownership is hard to establish.⁶⁴ The cross-border nature of these activities makes it hard for law enforcement and competent authorities to investigate and prosecute grand corruption cases. To disrupt complex corporate structures used for illicit purposes, law enforcement and competent authorities must have timely access to accurate and comprehensive data on both basic and beneficial ownership information. The UK's own registers of legal and beneficial ownership information need to be part of a network of high-quality registers maintained globally to prevent corrupt actors from exploiting gaps.
64. To facilitate this, we will continue to advocate for public registers of beneficial ownership transparency to become a global norm, recognising their critical role in combating corruption, promoting a transparent and fair business environment, while reinforcing public trust in governance.⁶⁵ We will support other jurisdictions to meet this standard, including in the UK's OTs and CDs. Our ambition is that opportunities to obscure corrupt funds through complex ownership structures are substantially reduced. We will design and implement activities over the next five years to meet this ambition, and have initially agreed the following commitments.
- I. Continue **working with the CDs and OTs to enhance beneficial ownership transparency**, including the implementation of registers with broad and inclusive legitimate interest access in line with UK expectations, as an interim step to public registers. The UK anticipates this will be delivered in line with commitments made at the Joint Ministerial Council in November 2024 for the OTs, and for the CDs, implementation aligned with the EU's July 2026 deadline (FCDO, JACU) (priority commitment).
 - II. The Anti-Corruption Champion will lead a comprehensive evidence-based **government review of asset ownership** in the UK to identify if there are any vulnerabilities and gaps, working with law enforcement and other agencies to explore how to enhance data interoperability and utility (HO) (priority commitment).
 - III. Develop a **robust evidence base** on the use of beneficial ownership data, beyond anti-money laundering and counter-terrorist financing, in collaboration with business representative organisations, civil society and multilateral organisations, to foster a trusted business environment, enhance investor confidence and drive sustainable economic growth (FCDO, DBT) (priority commitment).

64 Governance and Integrity Anti-Corruption Evidence, Corruption, Shell Companies, and Financial Secrecy: Providing an Evidence Base for Anti-Corruption Policy, 2024, available at: <https://giace.org/resources/corruption-shell-companies-and-financial-secrecy/>

65 Companies House, 'New report estimates value of Companies House data at up to £3 billion per year', 2019, available at: <https://www.gov.uk/government/news/new-report-estimates-value-of-companies-house-data-at-up-to-3-billion-per-year>

- IV. Improve **access for UK law enforcement agencies** and other relevant UK competent authorities to beneficial ownership information on overseas entities by developing agreements on the timely and effective exchange of beneficial ownership information between the UK and key international jurisdictions (JACU) (priority commitment).
- V. Work more closely with **international partners** to support wider access to beneficial ownership data, ideally through public registers of company ownership and central registers of trust ownership, and better use of quality data through wider uptake of the Beneficial Ownership Data Standard (FCDO).
- VI. Offer tailored, expert-led **technical assistance** to support jurisdictions to build stronger beneficial ownership frameworks and reduce vulnerabilities to illicit finance and corruption (DBT, FCDO).

Crown Dependencies and Overseas Territories – legitimate interest access

The CDs and OTs are separate, largely self-governing jurisdictions with their own elected governments responsible for their domestic affairs, including, in those CDs and OTs with provisions for financial services, the responsibility for regulation and company registry in their jurisdictions.

While important steps have been taken to improve beneficial ownership transparency in the CDs and OTs, continued efforts are required to see meaningful progress on this agenda. In 2023, the CDs announced plans to introduce a register accessible to those with a “legitimate interest”. At the 2024 UK-OT Joint Ministerial Council, the OTs committed access to their beneficial ownership registers to those with a legitimate interest as a minimum. It remains the UK’s ultimate expectation that all CDs and OTs will implement publicly accessible registers.

The UK expects the CDs and OTs to implement a legitimate interest access regime that ensures broad access to beneficial ownership data. This access should be available to a wide range of users – including journalists, civil society and academics – through an inclusive and straightforward process for demonstrating legitimate interest. Access must be timely, granted either for free or for a reasonable cost and duration, and supported by a transparent, impartial, decision-making process. The privacy of those requesting access should be safeguarded, with no notification to the subjects of the data. Information on the register must be accurate and regularly updated, and it should enable effective interrogation of the data and proactive investigations.

International asset recovery

Assets are recovered and used to reduce harms of corruption overseas (Outcome 1.3b)

65. Asset recovery is a critical tool to strip corrupt actors of their ill-gotten gains. Between March 2019 and March 2025, over £389 million has been recovered in relation to grand corruption using asset recovery powers under the Proceeds of Crime Act 2002.⁶⁶ However, the asset recovery environment is complex. To develop a more efficient and effective system, we need to set clear direction, underpinned by clarity and collaboration.
66. Some countries lack the capacity to undertake complex, multi-jurisdictional investigations necessary to trace and recover stolen assets. Through the utilisation of the IACCC, and other organisations, affected states can be supported to undertake asset recovery work, build capacity and implement effective legal frameworks.
67. The UK has a strong track record of returning assets, with £221.2 million returned between 2019 to 2020 and 2023 to 2025, but we remain focused on further improving our performance.⁶⁷ Foreign bribery cases are complex by nature, making it challenging to identify overseas victims of bribery and quantify the losses they have suffered as a result of criminal conduct. Although this challenge is not unique to the UK, we will seek to continue to be a global leader in tackling corruption and returning assets to affected states.

66 Home Office, Asset recovery statistics, 2025, available at: <https://www.gov.uk/government/collections/asset-recovery-statistics>

67 Home Office, Asset recovery statistics, 2025, available at: <https://www.gov.uk/government/collections/asset-recovery-statistics>

Case study: Returning the proceeds of corruption to Moldova

In 2021, the UK returned nearly half a million pounds of corrupt funds to the government of Moldova to fund social assistance for vulnerable people.

Former Moldovan Prime Minister Vlad Filat was accused of involvement in the theft of over \$1 billion (approximately £646 million) from the Moldovan banking system. Following conclusion of the forfeiture proceedings against Vlad Filat's son, Luca Filat, the NCA recovered £466,000.



The return was conducted in line with the UK's published Framework for Transparent and Accountable Asset Return.⁶⁸ The Framework builds upon the principles agreed at the Global Forum for Asset Recovery (GFAR), which acknowledge that the asset return process should be transparent, accountable and in the best interests of both the requested and requesting state.⁶⁹

The UK and Moldova have worked in partnership to agree a Memorandum of Understanding which ensures the returned assets are used towards projects which benefit Moldovan people.⁷⁰ The Memorandum of Understanding also provided for transparency and accountability through the appointment of a monitoring civil society organisation.

68. Our ambition is that assets are recovered and used to reduce harms of corruption overseas. We will design and implement activities over the next five years to meet our ambition, and have initially agreed the following commitments.
- I. Provide enhanced support to affected states in **tracing and recovering stolen assets** (HO, FCDO, NCA).
 - II. Continue to support the **capacity building** of affected states, to improve the sustainability of asset recovery capabilities (HO, FCDO, NCA).

68 Home Office, Framework for transparent and accountable asset return, 2022, available at: <https://www.gov.uk/government/publications/framework-for-transparent-and-accountable-asset-return>

69 Global Forum on Asset Recovery, 'GFAR principles for disposition and transfer of confiscated stolen assets in corruption cases', available at: <https://star.worldbank.org/sites/star/files/the-gfar-principles.pdf>

70 Home Office, MOU between UK and Moldova on the return of funds forfeited by the National Crime Agency in relation to Luca Filat, 2021, available at: <https://www.gov.uk/government/publications/return-of-funds-forfeited-by-the-national-crime-agency-luca-filat-agreement-between-uk-and-moldova/mou-between-uk-and-moldova-on-the-return-of-funds-forfeited-by-the-national-crime-agency-in-relation-to-luca-filat#use-of-returned-funds>

- III. Explore how we can further utilise the **private sector and civil society** to increase asset recovery capacity and capabilities (HO).
- IV. Consider current UK policies and procedures for **compensating victims of foreign bribery** and make recommendations for reform (HO).
- V. Publish **guidance on existing routes to compensation**, which will explain terminology and signpost potential victims to the most appropriate options (HO).

Professional enablers

Professional enablers who support corrupt actors are disrupted and held to account (Outcome 1.3c)

- 69. Corrupt actors often seek specialist expertise to service a spectrum of needs, including laundering money, legitimising wealth, and protecting reputations. While the vast majority of firms operate within the law and take action against criminality and attempted criminality, a minority subset of financial and professional services firms known as ‘professional enablers’ play a key role in helping corrupt and other malign actors to access these services and enable their wrongdoing.⁷¹ These services can help corrupt actors to move wealth covertly through the global financial system, create legitimate public profiles, gain credibility and integrate into elite circles. The actions of professional enablers worry the British public, with 70% concerned about the possibility of UK professional services such as lawyers or accountants using financial structures to conceal or transfer wealth on behalf of corrupt actors from abroad.⁷²
- 70. Addressing this challenge requires a multifaceted approach, including robust supervision of at-risk professions, public-private information sharing, targeted disruptive actions, and emphasis on professional ethics in sectors exposed to corruption risks. Positive steps have been taken, with the NCA’s NECC publishing a Professional Enablers Strategy 2024-2026. The NECC is also working with partners, including professional body supervisors and policing, to improve information sharing and create a comprehensive guide on professional enablers, while also building a stronger evidence base around their activities.⁷³

71 Professional enablers are “individuals or organisations that provide professional services that enables criminality. Their behaviour is deliberate, reckless, improper, dishonest and/or negligent through a failure to meet their professional and regulatory obligations”. UK government definition, Economic Crime Plan 2, available at: https://assets.publishing.service.gov.uk/media/642561b02fa8480013ec0f97/6.8300_HO_Economic_Crime_Plan_2_v6_Web.pdf

72 Home Office, UK public’s concerns, perceptions and understanding of corruption, 2025, available at: <https://www.gov.uk/government/publications/uk-publics-concerns-perceptions-and-understanding-of-corruption>

73 National Crime Agency, Cross-System Professional Enablers Strategy 2024 to 2026, available at: <https://www.nationalcrimeagency.gov.uk/who-we-are/publications/724-cross-system-professional-enablers-strategy/file>

Taskforce on Business Ethics and the Legal Profession

While most law firms comply with sanctions and anti-money laundering requirements, there has been growing concern that some firms in the legal profession are able to represent clients who are the beneficiaries of kleptocracy, while remaining technically compliant with current legal frameworks.

From 2023 to 2025, a Taskforce on Business Ethics and the Legal Profession was established to review the current rules, practices and approaches used by UK lawyers to determine which clients to represent, specifically in relation to facilitating financial flows from kleptocracy and grand corruption.⁷⁴

The Taskforce was comprised of former senior partners from major city law firms, members of the Bar, and legal scholars alongside academics and civil society. The Taskforce released their recommendations in April 2025, which focused on measures the legal profession could take to safeguard its reputation and further demonstrate a commitment to act in the public interest. Recommendations included a “Legitimate Provenance of Wealth Test”, which requires law firms to exercise their judgement and seek credible explanation for a client’s wealth, and stronger client acceptance procedures aimed at mitigating corruption risks.

Professional ethics have a key role to play in addressing the complex challenge of professional enablers of corruption. Innovative approaches to this problem, such as those offered by the Taskforce, will be required going forward as a complement to regulation.

71. Our ambition is to ensure that professional enablers who support corrupt actors to launder money, legitimise wealth and protect their reputations are held to account. We will design and implement activities over the next five years to meet this ambition, and have initially agreed the following commitments.
 - I. Fund a dedicated professional enablers co-ordinator to provide enhanced co-ordinator to the PURSUE response while exploring other options to build capacity and capability to improve the **operational response to professional enablers** (NECC, JACU) (priority commitment).
 - II. Take action to **mitigate risks in the high-risk sectors identified in the National Risk Assessment**. This will include consulting on adding new regulated activities to the money laundering regulations over the lifetime of the strategy (HMT, HO) (priority commitment).

⁷⁴ The Taskforce took as its focus solicitors in England and Wales.

- III. Enhance HM Government's (HMG) **understanding of the threat** from international professional enablers in fuelling corruption and illicit finance, through new analytical collaborations between HMG and external partners (NECC, FCDO, OPBAS).
- IV. Expand the use of **sanctions**, alongside existing law enforcement tools, to target professional enabler networks. Strengthen the UK sanctions system to further restrict the ability of professional enablers to move the proceeds of corruption (FCDO, HMT).
- V. Deepen HMG's **partnership with jurisdictions** also exposed to professional enabler risks, focused on encouraging and supporting information sharing, strengthening supervision and supporting operational co-operation (FCDO, NECC, OPBAS).
- VI. Strengthen **public and private sector collaboration and awareness** on the threat and risks posed by professional enablers of corruption through the NECC's Joint Money Laundering Intelligence Taskforce model and other forums, in particular by improving the identification and reporting of enabling activity (HO, FCDO, NECC, OPBAS).

Reforming anti-money laundering and counter-terrorist financing supervision

Effective supervision of regulated firms' anti-money laundering and counter-terrorist financing (AML/CTF) work is fundamental to protecting the UK's economy and national security, playing a key role in tackling illicit finance and supporting sustainable growth.

Professional and business services are a UK success story, able to drive growth, innovation and investment for both the domestic and global economy. But the UK's position as a world-leading financial services centre, and the international reputation of the UK's professional services, can also attract higher-risk activity and leave us vulnerable to bad actors seeking to abuse the system. Russia's illegal full-scale invasion of Ukraine shone a light on the reach of dirty money and the danger kleptocracy poses to the UK's national security. Clamping down on global corruption and keeping the UK's economy and reputation untarnished by illicit finance has never been more important.

Despite improvements in recent years including the creation of the Office for Professional Body AML Supervision (OPBAS) in 2017, the current system for supervising AML/CTF compliance remains fragmented, with multiple professional bodies applying different standards and approaches to AML/CTF oversight of professional services. This complexity and inconsistency creates uncertainty for firms and weakens the UK's defences.

To address this, the Government announced on 21 October 2025 that it will give the Financial Conduct Authority (FCA) responsibility for AML/CTF supervision of lawyers, accountants, and trust and company service providers. The vast majority of professional services firms are compliant with the Money Laundering Regulations. However, consolidating AML/CTF supervision of professional services firms will create a simpler, more effective regime. The FCA will have the powers and resources it needs to take more decisive action against non-compliance where it does occur, and the reform will also improve transparency and better align the UK's regime with international expectations. The supervision of other sectors subject to the Money Laundering Regulations will continue to be carried out by the Gambling Commission, the FCA and HMRC.

This reform will replace the current patchwork with a single, accountable supervisor for professional services firms, which will apply consistent standards, strengthen enforcement, and take more risk-based and proportionate decisions. The FCA's experience of supervising financial services firms and prioritising a data-driven approach in its work will help to ensure the success of this reform and guarantee that professional and financial services firms are held to the same standards. The FCA will also be able to co-ordinate more closely with law enforcement agencies with enhanced information-sharing increasing the detection and disruption of sophisticated money laundering schemes.

This change will represent significant structural reform and implementation will, therefore, necessarily take a number of years. Maintaining clear supervisory expectations for professional services firms during this interim period is of paramount importance and HM Treasury and OPBAS will continue to work closely with existing supervisors as they monitor and enforce compliance. Firms will transition from their existing supervisors to the FCA in a phased way, ensuring continuity. During this period, OPBAS will continue to function with its existing powers intact, providing ongoing oversight of existing supervisors and intervening directly as necessary if supervision is deemed to be inadequate.

More details are set out in the response to HM Treasury's 2023 consultation, published on 21 October 2025, and a new consultation, published on 6 November 2025, which seeks views on the powers the FCA will require in order to be effective in its expanded role.^{75,76}

75 HM Treasury, Reforming anti-money laundering and counter-terrorism financing supervision, 2025, available at: <https://www.gov.uk/government/consultations/reforming-anti-money-laundering-and-counter-terrorism-financing-supervision>

76 HM Treasury, Anti-money laundering and counter-terrorism financing supervision reform: duties, powers and accountability consultation, 2025, available at: <https://www.gov.uk/government/consultations/anti-money-laundering-and-counter-terrorist-financing-supervision-reform-duties-powers-and-accountability-consultation>

Pillar 2:

Tackling UK vulnerabilities



Pillar 2: Tackling UK vulnerabilities

Tackle vulnerabilities to corruption in the UK (Objective 2)

72. The second pillar of the strategy seeks to tackle vulnerabilities in the UK to corruption and exploitation by corrupt actors. To do this we will focus our response on **politics and government, public officials, and business integrity**.

2.1: Politics and government

Restoring trust through high standards and safeguarding against exploitation by corrupt actors (Outcome 2.1)

73. As set out by the Prime Minister in the Ministerial Code, restoring trust in politics is the great test of our era. That trust has been damaged in recent years by scandals which eroded the high standards we rightly expect of those in public life.
74. To restore trust between the public and politics, the government is committed to reinforcing standards and the systems which support them, by putting ethics and integrity at the heart of its approach to public service. A government that carries the trust of the public is better placed to deliver what matters: effective public services, and the creation of a stable foundation for growth, reassuring private sector businesses with the certainty they need to invest and grow in the UK.
75. To successfully restore trust through high standards and safeguarding against exploitation by corrupt actors, we will focus on **standards in public life and political donations**, covering how the current set of anti-corruption frameworks and standards can be reaffirmed, and strengthened where necessary.

The Seven Principles of Public Life⁷⁷

The Seven Principles of Public Life outline the ethical standards those working in the public sector are expected to adhere to. They were first set out 30 years ago by Lord Nolan in 1995 and they are included in a range of codes of conduct across public life.

The seven principles are: selflessness, integrity, objectivity, accountability, openness, honesty and leadership.

77 HMG, The Seven Principles of Public Life, 1995, available at: <https://www.gov.uk/government/publications/the-7-principles-of-public-life/the-7-principles-of-public-life--2>

Standards in public life

High standards in public life are restored (Outcome 2.1a)

76. The public must be able to trust those in public life to demonstrate high standards of integrity. This is particularly the case in central government, where standards are the responsibility of the Prime Minister, supported by the Cabinet Office but engaging the whole of government. The core foundation of frameworks that exist to uphold these standards encompasses a variety of laws, regulations, binding codes of professional conduct, guidance and constitutional conventions. What they share in common is the same core principles, in particular the Seven Principles of Public Life. This government views the Seven Principles as fundamental to everything we do, as we return Britain to the service of working people.
77. This system of frameworks is distinct from those which exist to combat criminal corruption, but standards of integrity often influence the public's perceptions of levels of corruption. If standards are not met, the perception that corruption is prevalent can increase, corroding public trust, irrespective of whether corruption is taking place or not. Many of the existing frameworks are effective and foundational to our precedent-based constitution. The government seeks to reaffirm these frameworks pragmatically rather than rebuild them, as part of a wider rewiring of the state, with the public interest at the heart of everything we do. That includes ensuring the state is focused on effectively delivering the Plan for Change.

Standards in public life: Changes since July 2024

Since coming to power, the current government has introduced the following measures to improve standards in public life.

- Published a new, stronger Ministerial Code to take full account of the Seven Principles of Public Life.
- Enabled the Independent Adviser on Ministerial Standards to initiate investigations without needing the Prime Minister's consent.
- Strengthened guidance for ministers on gifts and hospitality, including introducing a new central register of Ministers' Gifts and Hospitality, published monthly to provide greater transparency.
- Published a new Governance Code on Public Appointments.



The government has also sought to improve standards in Parliament. In the House of Commons, the House accepted the government's proposal to remove certain exemptions on the provision of paid parliamentary advice, and the Commons Committee on Standards is conducting an inquiry on further strengthening the rules on MPs' outside interests.⁷⁸

78. The government has also given careful consideration to a series of further reforms to strengthen standards across the public sector. The government subsequently announced in July 2025 that it would establish an Ethics and Integrity Commission to strengthen probity in public life, delivering on a key manifesto commitment, by strengthening and reforming the Committee on Standards in Public Life.⁷⁹ The government also announced that it would make changes to ensure severance payments for ministers are proportionate and fair, and strengthen the Business Appointments system by closing the Advisory Committee on Business Appointments and transferring its functions to other bodies, with new sanctions introduced for breaches of the rules.

78 UK Parliament, Transparency and Accountability, 2024, available at: <https://questions-statements.parliament.uk/written-statements/detail/2024-11-06/hcws198>

79 Cabinet Office, Ethics and Integrity Commission to drive up standards across the public sector, 2025, <https://www.gov.uk/government/news/ethics-and-integrity-commission-to-drive-up-standards-across-the-public-sector>

79. Our ambition is that high standards in public life are restored. We will design and implement actions over the next five years to meet this ambition, and have initially agreed the following commitments. The government has recently begun work to deliver on these commitments.⁸⁰
- I. **Establish an Ethics and Integrity Commission** to strengthen probity in public life by strengthening and reforming the Committee on Standards in Public Life, creating an authoritative body with a mandate to drive up ethical standards across the public sector (CO) (priority commitment – delivered in October 2025).
 - II. **Implement the Public Office (Accountability) Bill** to ensure openness and transparency across the public sector, including its planned obligation for all public bodies to have a code of ethical conduct, supported by the Ethics and Integrity Commission as a Centre of Excellence on public sector codes of conduct (CO) (priority commitment).
 - III. **Strengthen the Business Appointments system** by closing the Advisory Committee on Business Appointments and moving its functions to other bodies, streamlining the system and enhancing compliance by introducing new sanctions for breaches of the rules (CO) (priority commitment – delivered in October 2025).
 - IV. **Reform ministerial severance payments** by introducing a new minimum service requirement of six months for ministers to receive severance payments, with the expectation that ministers will forgo payments if leaving office following a serious breach of the Ministerial Code (CO) (delivered in October 2025).
 - V. Consider the recommendations of the Committee on Standards report on **MPs’ outside interests** (CO).
 - VI. **Continue to keep transparency around lobbying under review**, factoring into consideration the recommendations from the Public Administration and Constitutional Affairs Committee’s report as any policy reforms are considered (CO).

80 UK Parliament, Government of service, 2025, <https://questions-statements.parliament.uk/written-statements/detail/2025-07-21/hcws870>

Political donations

Safeguards protect against corrupt actors exploiting the UK's political financing framework (Outcome 2.1b)

80. A lack of transparency around sources of funding for political donations is a key risk which can be exploited by corrupt actors. It threatens the health of our democracy and our national security as corrupt actors from foreign states seek to influence UK policy making to serve their interests and undermine the UK's interests. In particular, illegal foreign donations can be funnelled through legal donors, such as individuals, companies and unincorporated associations who can be used as proxy donors.
81. These vulnerabilities and proposals for reform have been identified by a wide range of bodies and organisations, including the Committee on Standards in Public Life and the Electoral Commission.^{81,82} The government recognises there are risks that need to be addressed and through the Government Strategy for Elections, the Ministry of Housing, Communities and Local Government (MHCLG) will bring forward legislative proposals to provide additional safeguards against illegal foreign donations entering UK politics.
82. Our ambition is that safeguards protect against corrupt actors exploiting the UK's political financing framework. We will design and implement actions over the next five years to meet this ambition, and have initially agreed the following commitments.
 - I. Strengthen rules on **company political donations** (MHCLG) (priority commitment).
 - II. All donors to make a declaration around any connected sources of funding to **deter proxy donations** (MHCLG) (priority commitment).
 - III. Introduce new requirements on those receiving political donations to undertake risk assessments, with the Electoral Commission producing guidance on **enhanced due diligence** (MHCLG).
 - IV. Increase reporting requirements for **unincorporated associations** to increase transparency around their funding (MHCLG).
 - V. Give the Electoral Commission responsibility for enforcing candidate and local third-party campaigner **election finance offences** rather than non-specialist police (MHCLG).
 - VI. Increase the Electoral Commission's **maximum fining powers** (MHCLG).

81 Committee on Standards in Public Life, Regulating Election Finance – A Review by the Committee on Standards in Public Life, 2021, available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999636/CSPL_Regulating_Election_Finance_Review_Final_Web.pdf

82 Electoral Commission, Written Evidence by the Electoral Commission, available at: <https://committees.parliament.uk/writtenevidence/128808/pdf/>

2.2: Public sector

Public sector bodies in the UK prevent and deter corruption effectively (Outcome 2.2)

83. The public sector is vulnerable to exploitation by corrupt actors given its substantial scale and reach in the UK. Six million employees manage over £1 trillion in public funds, providing essential services crucial to the nation's security, growth, and well-being.^{83,84} Of the British public, 86% are concerned about the possibility of corruption in at least one category of public officials, with particularly high concern for police officers, prison officers, and local government employees.⁸⁵
84. The overwhelming majority of UK public sector officials work in the public interest. However, corrupt actors can exploit vulnerabilities in areas like border control, immigration detention, law enforcement, and prisons. This can damage the integrity of the institutions, hurt individuals and benefit organised criminals, terrorists, and foreign states. Decisions around how public money is spent, or services are delivered, are also vulnerable to corrupt individuals. If public officials are seen to act corruptly, this can lead to a loss of public trust in local and national institutions.^{86,87} Corruption in defence and security can weaken national security, reducing the government's ability to respond to domestic and international threats. We want to take further action to strengthen our resilience to corruption in the public sector.
85. To successfully prevent and deter corruption more effectively within UK public sector bodies, we will focus on **local government, corrupt insiders, procurement and capability and knowledge**.

83 Office for National Statistics, Public sector employment, UK: June 2024, available at:

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/publicsectorpersonnel/bulletins/publicsectoremployment/june2024>

84 Office for Budget Responsibility, A brief guide to the public finances, available at: <https://obr.uk/forecasts-in-depth/brief-guides-and-explainers/public-finances/>

85 Home Office, UK public's concerns, perceptions and understanding of corruption, 2025, available at: <https://www.gov.uk/government/publications/uk-publics-concerns-perceptions-and-understanding-of-corruption>

86 Institute for Government, 'Rebuilding trust in public life', 2024, available at: <https://obr.uk/forecasts-in-depth/brief-guides-and-explainers/public-finances/>

87 OECD, Trust in government, 2024, available at: <https://www.oecd.org/en/topics/sub-issues/trust-in-government.html#:~:text=For%20a%20thriving%20democracy%20and,trust%20in%20our%20public%20institutions>

Local government

Corruption risks in local government are identified and addressed (Outcome 2.2a)

86. Most people interact with the public sector through local and regional government, which have over a million employees in England providing more than 800 services.⁸⁸ Local government councillors and officers fulfil a vital role, and the overwhelming majority of people work hard and are committed to the public good. Local government officers and councillors are already expected to meet standards for integrity, accountability, and conduct in public office to prevent misconduct and reduce the risk of corruption. While cases are rare, any instance of corruption can erode public trust.
87. Inconsistent management of conflicts of interest, gifts, and business appointments, combined with the erosion of local authority audits, can create an environment that increases the risk of corruption.^{89,90,91} The UK is committed to upholding strong integrity standards and oversight in both national and local government.⁹² This strategy presents an opportunity to reaffirm these commitments and to prioritise the effective mitigation of local corruption risks in the UK's future anti-corruption response.

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- 88 Local Government Association, Local government workforce summary data, 2025, available at: <https://www.local.gov.uk/our-support/workforce-and-hr-support/local-government-workforce-data/local-government-workforce> and Local Government Association, The local government workforce, available at: <https://www.local.gov.uk/our-support/online-and-hybrid-meetings/councillor-hub/introduction-local-government/local>
- 89 Committee on Standards in Public Life, Local Government Ethical Standards, 2019, available at: https://assets.publishing.service.gov.uk/media/5c5c3f68e5274a3184bac66f/6.4896_CO_CSPL_Command_Paper_on_Local_Government_Standards_v4_WEB.PDF and Committee of Public Accounts, Tackling fraud and corruption against government, 2023, available at: <https://publications.parliament.uk/pa/cm5803/cmselect/cmpubacc/1230/report.html>
- 90 In 2023, only 1 % of local audits were completed on time. Ministry of Housing, Communities and Local Government, Significant measures to tackle worsening backlog in local audit, 2024, available at: <https://www.gov.uk/government/news/significant-measures-to-tackle-worsening-backlog-in-local-audit#:~:text=It%20comes%20after%20only%201,undermine%20local%20accountability%20and%20governance>
- 91 Transparency International UK, Ensuring integrity in local planning across London, available at: <https://www.transparency.org.uk/publications/ensuring-integrity-local-planning-across-london> and Ministry of Housing, Communities and Local Government, Review into the risks of fraud and corruption in local government procurement, 2020, available at: https://assets.publishing.service.gov.uk/media/5ede321ce90e073a07056d08/Fraud_and_corruption_risks_in_local_government_procurement_FINAL.pdf
- 92 The UK is a state party to the United Nations Convention against Corruption (UNCAC) and a member of the Group of States against Corruption (GRECO), both of which aim to uphold high standards of integrity in public life and prevent corruption at all levels of government.
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Case study: Bribery and corruption at Cardiff City Council

In November 2023, five men were sentenced for their involvement in bribery and corruption related to waste disposal contracts, resulting in a loss of over £400,000 to Cardiff City Council.



Warren Roberts paid bribes to Cardiff Council staff to manipulate waste disposal records. This corruption was uncovered after a whistleblower reported the activities, leading to an investigation by South Wales Police. The bribery resulted in Cardiff Council losing around £417,000 in tipping fees. Approximately £175,000 in bribes were paid to council staff. The men received sentences ranging from 18 to 28 months' imprisonment.⁹³

88. Our ambition is that corruption risks in local government are identified and addressed. We will design and implement activities over the next five years to meet this ambition, and have initially agreed the following commitments.
- I. Establish a new statutory and **independent Local Audit Office** in England to improve audit system transparency and quality control, contributing to greater accountability and strengthening scrutiny in relation to the misuse of public funds (MHCLG) (priority commitment).
 - II. Subject to separate agreement, in England introduce a **new mandatory Code of Conduct** for elected local government officials through legislation, including robust sanctions for breaches, and explore additional powers to strengthen the Code to uphold integrity standards in local government (MHCLG) (priority commitment).
 - III. Subject to separate agreement, consider establishing **independent oversight** for England on local government standards to provide assurance of appeals processes (MHCLG).

⁹³ South Wales Police, 'Five men convicted of bribery ordered to pay back more than £365,000 to Cardiff Council', 2024, available at: <https://www.south-wales.police.uk/news/south-wales/news/2024/october/five-men-convicted-of-bribery-have-been-ordered-to-pay-back-more-than-365000-to-cardiff-council/>

Insider threat

Corrupt insiders are identified effectively and prevented from working in high-risk public sector bodies (Outcome 2.2b)

89. Insiders in both the public and private sector can enable organised crime groups to offend. Though few in number, their impact can be significant, undermining public trust in the integrity of frontline services.⁹⁴ Services critical to national security like borders, immigration detention, prisons, tax, police, and defence have developed strategies to tackle corruption, but we need to go further with improved vetting and information sharing to prevent corrupt insiders from moving between sectors undetected.

Case study: Corrupt insider at the UK border

In June 2024, Border Force officer Kevin Smith was jailed for two years for allowing a car with 15kg of ecstasy through his Portsmouth Port checkpoint in August 2023.



The NCA had placed Smith under surveillance after suspecting insider involvement. CCTV footage showed Smith meeting with drug gang ringleader David Johnson in Portsmouth before the smuggling attempt. The drugs, valued at £400,000, were intercepted by police on the way to London. Kevin Smith cultivated a relationship with David Johnson while he was employed as a Prison Officer, when Johnson had been serving a sentence for drugs importation. The corrupt relationship continued when Smith transferred from the Prison Service to Border Force.

The NCA highlighted the rarity but significant threat of such corruption, noting that individuals like Smith are invaluable to organised crime groups due to their access and knowledge.⁹⁵

94 POST, Public trust and confidence in the police, 2024, available at: <https://post.parliament.uk/public-trust-and-confidence-in-the-police>

95 BBC News, 'Corrupt Portsmouth border officer jailed for aiding drugs gang', 2024, available at: <https://www.bbc.co.uk/news/articles/ck77vzz2lxo#:~:text=A%20corrupt%20Border%20Force%20officer,Hampshire%20on%2026%20August%202023>

90. Our ambition is that corrupt insiders are identified effectively and prevented from working in high-risk public sector bodies. We will design and implement activities over the next five years to meet this ambition, and have initially agreed the following commitments.
- I. Support the **establishment of a national integrity screening capability** for policing to improve public trust, enhance confidence, and reduce harm to our communities, while also exploring its potential to strengthen workforce assurance across the wider public sector (HO, NPCC) (priority commitment).
 - II. Pilot the feasibility of utilising **Police National Database** data in National Security Vetting (CO, UKSV) (priority commitment).
 - III. Ensure **police forces can easily access and share** relevant information about applicants or transfers from the armed forces and other government agencies, so they have a full picture of each person's background (HO, CoP, NPCC) (priority commitment).⁹⁶
 - IV. Issue UK government **Insider Risk Guidance** outlining the best strategies and approach to managing insider risk and common activities and procedures for UK public bodies (CO).
 - V. **Exempt Border Force and Immigration Enforcement staff** from the Rehabilitation of Offenders Act to ensure disclosure of spent convictions (Border Force, Immigration Enforcement).⁹⁷
 - VI. Implement **additional integrity checks** on new staff at Border Force or those renewing security clearance, and expand integrity checks to existing staff (Border Force).
 - VII. In **prisons and probation**, develop an enhanced Counter Corruption Prevent Strategy, a refreshed Corruptor Management Strategy, and a refreshed conflict of interest process (HMPPS).
 - VIII. In **law enforcement**, create barred and advisory lists for the NCA, Civil Nuclear Constabulary, British Transport Police and Ministry of Defence Police and ensure that policing bodies do not employ or appoint anyone on those lists. Also consider using further legislative powers to create barred and advisory lists for other law enforcement agencies (HO, DESNZ, DfT, MOD).
 - IX. In **defence**, improve the processes and standards in vetting, implementation of a joint vetting centre, and improved data capability to monitor, detect and predict insider risk (MOD).
 - X. Within the **Civil Service**, broaden the Internal Fraud Hub (formerly the Internal Fraud Database) beyond fraud and illicit financial gain to capture individuals dismissed for corruption-type offences (PSFA).

96 The Ministry of Defence (including the Army, the Royal Air Force and the Royal Navy, as well as their respective reserve forces); fire and rescue services; HM Prison and Probation Service; other police forces; and relevant government agencies, such as Border Force or Immigration Enforcement.

97 Under the Rehabilitation of Offenders Act 1974, spent convictions usually don't need to be disclosed to employers, unless the job is exempt. Serious or multiple offences are always disclosed.

Procurement

Corruption risks in public sector procurement are mitigated and addressed (Outcome 2.2c)

91. Public procurement accounts for around a third of all public expenditure in the UK every year.⁹⁸ While there is no evidence of systemic corruption in public procurement, this level of expenditure, together with the levels of interaction between officials, business and other stakeholders, creates an increased risk of corruption and fraud.
92. The Procurement Act 2023 will act as a further deterrent and ensure consequences for corruption and fraud misconduct. The Act introduced a central digital platform which enables public access to procurement information. Rules around supplier exclusion have also been strengthened to prevent unscrupulous suppliers from being awarded public contracts, and a debarment list has been introduced that identifies suppliers that must or may be excluded from procurements across the public sector. The newly strengthened Procurement Review Unit (PRU) in the Cabinet Office manages the debarment list to ensure compliance with the new procurement rules and to protect public money from suppliers who pose the greatest risks.
93. In early 2025, the Prime Minister set out the biggest sustained increase in defence spending since the Cold War. While this pledge is crucial for safeguarding the British public in a new era of national security, it also heightens the risk of corruption in defence procurement. In implementing the 2025 Strategic Defence Review, the Ministry of Defence (MOD) will introduce radical reforms to the defence procurement system which the Public Accounts Committee and Defence Select Committee have both called 'broken'.^{99,100} Under Defence Reform, the creation of the National Armaments Directorate will significantly improve the effectiveness of defence procurement and better enable the MOD to mitigate the associated corruption risks.

98 Procurement expenditure in Public Expenditure Statistical Analyses is the sum of 'gross current procurement' and 'gross capital procurement'. HM Treasury, 'Public Expenditure Statistical Analyses 2023', available at: https://assets.publishing.service.gov.uk/media/64b69e320ea2cb001315e4f6/E02929310_HMT_PESA_2023_Accessible.pdf

99 Ministry of Defence, The Strategic Defence Review 2025 – Making Britain Safer: secure at home, strong abroad, 2025, available at: <https://www.gov.uk/government/publications/the-strategic-defence-review-2025-making-britain-safer-secure-at-home-strong-abroad>

100 UK Parliament, 'MOD defence equipment systems "broken and repeatedly wasting billions of taxpayers' money"', 2021, available at: <https://committees.parliament.uk/committee/127/public-accounts-committee/news/158463/mod-defence-equipment-systems-broken-and-repeatedly-wasting-billions-of-taxpayers-money/> and UK Parliament, 'It is broke – and it's time to fix it: The UK's defence procurement system', 2023, available at: <https://publications.parliament.uk/pa/cm5803/cmselect/cmdfence/1099/summary.html>

Excluding unfit companies from bidding for public contracts

Measures in the Procurement Act 2023 will raise procurement standards by taking tougher action on fraud and corruption. The Act has strengthened our ability to exclude suppliers deemed unfit to bid for public contracts. Contracting authorities must consider a supplier's recent past behaviour and circumstances to determine whether it should be allowed to compete for or be awarded a public contract.

The Procurement Act also imposes stricter obligations regarding conflicts of interest. Contracting authorities must identify, mitigate, and continuously review conflicts of interest. If a conflict provides a supplier with an unfair advantage and cannot be mitigated, the supplier must be excluded from that procurement.

Overall, the Act's enhanced provisions reinforce existing laws on fraud, bribery, and corruption and ensure that unscrupulous suppliers with a track record of fraud or corruption cannot be awarded public contracts, unless they can demonstrate that the circumstances giving rise to the misconduct are not continuing or likely to occur again.

94. Our ambition is that corruption risks in public sector procurement are mitigated and addressed, building on recent procurement legislation. We will design and implement activities over the next five years to meet this ambition, and have initially agreed the following commitments.
- I. Monitor participation rates of **procurement training** and evaluate the effectiveness of learning and development products (CO) (priority commitment).
 - II. Ensure **compliance** of the transparency regime under the Procurement Act 2023 and monitor data quality (CO).
 - III. Improve access to, and use of, **procurement data** for public reporting, and work with government stakeholders to shape transparency analytics and, if appropriate, make available in the public domain (CO).
 - IV. Plan to **review and evaluate** the effectiveness of the **debarment regime**, which allows ministers to list suppliers whose past conduct or circumstances disqualify them from public procurement (CO).
 - V. Monitor the **contracting authority landscape** through referrals and internal reports to the PRU, allowing for oversight and, where appropriate, recommending actions to improve compliance, including anti-corruption measures, with the Procurement Act (CO).
 - VI. **Analyse** the available commercial data held on the central digital platform to **generate insights and intelligence** on market performance, enabling assessment of potential corruption risks (CO).

Capability and knowledge

Corruption risks are proactively identified and acted on by public sector leaders and officials (Outcome 2.2d)

95. The UK public sector's strongest defence against corruption and fraud lies in the integrity and conduct of its public bodies and officials. For example, the Civil Service code sets out the core values of integrity, honesty, objectivity and impartiality, and prohibits using official information or position for personal gain.¹⁰¹ To further support this, the UK government has issued guidance that sets out professional standards for fraud risk assessment across central government. This includes mandatory Initial Fraud Impact Assessments (IFIA) for government major projects portfolio schemes (including procurements), along with practical tools such as templates, practice note, and step-by-step guidance for planning. Counter-fraud experts from the PSFA are taking proactive steps to combat fraud and protect the public purse, and conduct assurance of IFIAs to embed fraud prevention in major projects and provide feedback on all assessments.^{102,103}
96. The uptake of fraud and corruption training among civil servants is low.¹⁰⁴ This aligns with findings from the National Audit Office, which reports that most public bodies lack a clear understanding of the fraud and corruption risks they face, cannot demonstrate appropriate resourcing of counter fraud and corruption and, outside of tax and welfare, have limited counter fraud capability.¹⁰⁵ Efforts to tackle public sector corruption, often linked to fraud and bribery, should align with the work of the PSFA who lead efforts to build capability and reduce the risks and impact of fraud and corruption across the public sector.

101 The Civil Service code, 2015, available at: <https://www.gov.uk/government/publications/civil-service-code/the-civil-service-code>

102 Public Sector Fraud Authority, Initial Fraud Impact Assessment (IFIA) Practice Note, 2024, available at: <https://www.gov.uk/government/publications/initial-fraud-impact-assessment-practice-note/initial-fraud-impact-assessment-ifia-practice-note-html>

103 Public Sector Fraud Authority, Professional standards and guidance for fraud risk assessment in government, 2025, available at: <https://www.gov.uk/government/publications/professional-standards-and-guidance-for-fraud-risk-assessment-in-government/professional-standards-and-guidance-for-fraud-risk-assessment-in-government-html>

104 In 2024/25, Government Skills data shows nearly 120,000 civil servants completed the central Counter Fraud, Bribery and Corruption course. However, HMRC, the Department for Work and Pensions, HO and MOD, which constitute over 50% of the civil service workforce, chose not to mandate the course. This may be because they build counter fraud awareness with their own course(s) or in other ways, and do not require the central offer from Civil Service Learning.

105 National Audit Office, Tackling fraud and corruption against government, 2023, available at: <https://www.nao.org.uk/wp-content/uploads/2023/03/tackling-fraud-and-corruption-against-government.pdf>

Counter Bribery and Corruption Profession

In May 2023, the Government Counter Fraud Profession published a refreshed Standard for the Counter Bribery and Corruption Profession.¹⁰⁶ This was followed by the publication of a practice note on how to counter bribery and corruption.¹⁰⁷ The Counter Fraud Professional Standards and Guidance aim to provide a uniform, cross-government approach to combat fraud, bribery, and corruption, enhancing individual capabilities and improving organisational counter fraud and corruption efforts.

The standards contain the professional standards and guidance for the individual level of knowledge, skills and experience required to prevent, detect and respond to bribery and corruption. They include guidance setting out: what good-quality Counter Bribery and Corruption (CBC) products look like; the recommended processes for organisations to implement an effective CBC approach; and how to develop and implement CBC activity in an organisation to deal with those who commit fraud.

97. Our ambition is that public sector leaders and officials identify and act on corruption risk proactively. We will design and implement activities over the next five years to meet this ambition, and have initially agreed the following commitments.
- I. Deliver an updated programme of **corruption and fraud e-learning** to all national and local public sector officials at risk to fraudulent or corrupt practice, and make it mandatory for all civil servants (JACU, GCFP) (priority commitment).
 - II. Build awareness of the risks of fraud and corruption within national government by delivering an internal **communications campaign** for all civil servants (PSFA, GCFP).
 - III. Build an **effective culture** to tackle corruption, bribery and fraud within the public sector through development of the Counter Fraud Leadership Development Programme, developing the Fraud Control Level 4 Apprenticeship and a separate fraud control qualification (PSFA, GCFP).
 - IV. Enhance public bodies' ability to manage fraud and corruption risks by increasing high-quality **impact and risk assessments**, developing risk assessment tools, and training more qualified fraud risk assessors (PSFA).

¹⁰⁶ Public Sector Fraud Authority, A Standard for the Counter Bribery and Corruption Professional, 2023, available at: <https://www.gov.uk/government/publications/a-standard-for-the-counter-bribery-and-corruption-professional/a-standard-for-the-counter-bribery-and-corruption-professional-html>

¹⁰⁷ Public Sector Fraud Authority, How to Counter Bribery and Corruption Practice Note, 2024, available at: <https://www.gov.uk/government/publications/how-to-counter-bribery-and-corruption-practice-note>

2.3: Business integrity

British businesses operate with integrity in the UK and overseas markets (Outcome 2.3)

98. Bribery and corruption act as a break on growth by inflating costs, reducing opportunities for exporters and undermining the foundational institutions of healthy competitive markets.^{108,109,110,111} While the UK has made significant progress since the Bribery Act 2010 came into force, we recognise that more can be done to support businesses on a practical level to identify and reduce risks from corruption and strengthen prevention.
99. Corruption is only one part of the economic crime threat faced by the private sector, but it is a common enabler or predicate for other criminal activities and a key source of illicit wealth. The measures set out in this strand complement those in other parts of the strategy; in particular, actions under pillar 1 tackling corrupt funds and supporting law enforcement efforts. We will work with the private sector to inform and deliver commitments across these strands.
100. To successfully ensure British businesses operate with integrity in the UK and in overseas markets, we will focus on **prevention** and **overseas markets**.

Prevention

British businesses are able to identify and act on bribery and corruption risks in the UK and overseas (Outcome 2.3a)

101. The UK has developed resources and guidance to help companies understand bribery and corruption risks and put in place preventative measures, but this offer can be

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- 108 In a review of 427 foreign bribery cases, OECD found that bribes represented an average of 10.9% of the total value of transactions. OECD Foreign Bribery Report: An Analysis of the Crime of Bribery of Foreign Public Officials, 2014, available at: https://www.oecd.org/en/publications/oecd-foreign-bribery-report_9789264226616-en.html
 - 109 Home Office, Economic Crime Survey 2024, available at <https://www.gov.uk/government/publications/economic-crime-survey-2024>. For British companies operating internationally, 7% believed they had lost out on an overseas business opportunity in the last 12 months to a competitor which paid a bribe. Responses were higher for some high priority regions.
 - 110 Department for International Trade, DIT National Survey of Registered Businesses' Exporting Behaviours, Attitudes and Needs, 2017, available at: https://assets.publishing.service.gov.uk/media/5b1a9a6aed915d2cc0270cd4/DIT_National_Survey_main_report_08062018.pdf. Companies who had decided not to export to a given country were asked the factor behind their decision. 6% identified corruption and fraud.
 - 111 Literature reviews of academic studies confirming this include the following. Jenkins, M., 'The relationship between business integrity and commercial success', 2017, available at: <https://www.u4.no/api/publications/the-relationship-between-business-integrity-and-commercial-success/pdf>. Nichols, P. M., 'The business case for complying with bribery laws', American Business Law Journal, 2012, 49, pages 325-368, available at: <https://doi.org/10.1111/j.1744-1714.2012.01134.x>. Department for International Development, 'Why corruption matters: understanding causes, effects and how to address them', 2015, available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/406346/corruption-evidence-paper-why-corruption-matters.pdf.
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improved. The House of Lords and Organisation for Economic Co-operation and Development (OECD) have both called for more support for small and medium-sized enterprises (SMEs), which can lack resources to understand risks, implement anti-bribery procedures and resist demands for bribes by public officials.¹¹² These findings are reflected in the Economic Crime Survey 2024, which suggests a relationship between company size and anti-corruption measures in place.¹¹³

102. In addition to backing SMEs, the insights available to law enforcement agencies can provide valuable lessons for firms looking to strengthen anti-corruption measures. Under this strategy, the SFO will be testing and expanding its capability to help companies sharpen their defences against corruption and increase partnership with the private sector.

Responsible business conduct

Tackling bribery and corruption is a cornerstone of the government's approach to ensuring responsible business conduct. Human rights, labour rights, and environmental harms often arise in contexts where corruption occurs. The UK's Trade Strategy, released in June 2025, recognised this and launched a review into the UK's approach to responsible business conduct to ensure businesses operate with integrity across every area of corporate responsibility throughout supply chains. Its scope includes bribery and corruption.¹¹⁴

The review is led by the Office for Responsible Business Conduct, which is also tasked with promoting the OECD Guidelines for Responsible Business.¹¹⁵ The guidelines encourage companies to conduct risk-based due diligence to combat corruption and other issues. The Office provides a non-judicial complaint mechanism to address corporate harms, including corruption and bribery.

112 House of Lords, The Bribery Act 2010: post-legislative scrutiny, Chapter 8, available at: <https://publications.parliament.uk/pa/ld201719/ldselect/ldbriact/303/303.pdf> and OECD, Corporate Anti-Corruption Compliance Drivers, Mechanisms, and Ideas for Change, pp.67, available at: https://www.oecd.org/en/publications/corporate-anti-corruption-compliance-drivers-mechanisms-and-ideas-for-change_4245d0fc-en.html

113 Home Office, Economic Crime Survey 2024, available at: <https://www.gov.uk/government/publications/economic-crime-survey-2024>

114 HMG, The UK's Trade Strategy, 2025, available at: <https://assets.publishing.service.gov.uk/media/68838f4ebe2291b14d11af2e/uk-trade-strategy-print.pdf>

115 OECD, Guidelines for Multinational Enterprises on Responsible Business Conduct, 2023, available at: https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html

103. Our ambition is that British businesses are better equipped to identify and act on bribery and corruption risks. We will design and implement activities over the next five years to meet this ambition, and have initially agreed the following commitments.
- I. Launch a new **anti-bribery resource collection** on GOV.UK for UK businesses and other organisations with free resources to help them understand their exposure and implement measures which reduce bribery and corruption risks, and work with the private sector, academia and civil society to ensure this and other anti-corruption guidance remains in line with global best practice (JACU, DBT, FCDO) (priority commitment).
 - II. Expand the SFO's **crime prevention capability** to support companies in strengthening their protections against bribery and corruption (SFO) (priority commitment).
 - III. The **review into the UK's approach to responsible business conduct (RBC)** will include bribery and corruption, alongside other harmful practices related to the environment, human and labour rights (DBT).
 - IV. Based on the outcomes of the RBC review, assess further options for UK government to **incentivise companies** to put in place anti-bribery measures, including through access to public advantages (JACU).¹¹⁶
 - V. Clarify and strengthen incentives for **self-reporting** by corporates through the implementation of the SFO's External Guidance on Corporate Co-operation and Enforcement (SFO).

Overseas markets

Bribery and corruption risks faced by British businesses in high-risk overseas markets are mitigated (Outcome 2.3b)

104. The UK's Trade Strategy recognises that corruption harms UK businesses and prevents them from securing commercial opportunities overseas.¹¹⁷ We want to promote clean business environments for UK companies to operate in, especially as established principles about the importance of promoting fair competition by tackling bribery and corruption are being challenged internationally.

¹¹⁶ For examples, see Section XXIII.D. of the OECD Recommendation of the Council for Further Combating Bribery of Foreign Public Officials in International Business Transactions, 2021, available at: <https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0378>

¹¹⁷ See Chapter 6: Accountable trade, in HMG, The UK's Trade Strategy, 2025, available at: <https://assets.publishing.service.gov.uk/media/68838f4ebe2291b14d11af2e/uk-trade-strategy-print.pdf>

105. The UK has already taken some significant steps alongside other countries to reduce bribery and corruption risks, such as securing robust anti-corruption measures in its trade agreements with India, Australia, and New Zealand as well as through accession to the Comprehensive and Progressive Agreement for Trans-Pacific Partnership.^{118,119,120} We will build on this progress in this strategy, not only through continued partnership with other governments, but also by improving the practical support our diplomatic and trade network can provide to UK businesses operating overseas.

Case study: Anti-corruption provisions in trade agreements

Anti-corruption provisions in the UK's trade agreements (FTAs) reinforce international obligations on bribery and corruption at the United Nations and support collaboration to tackle these global issues within a trade and investment context.



For example, the recently agreed UK-India FTA includes obligations to maintain a range of measures to prevent and combat bribery and corruption, including the criminalisation of bribery and prohibiting fraudulent book-keeping practices, and measures to combat embezzlement and money-laundering. This was India's first ever anti-corruption chapter in an FTA.

In the Economic Crime Survey 2024, between 7% and 20% of businesses with employees that traded internationally believed it was very or fairly likely that they had lost a non-UK business opportunity to a competitor who offered a bribe in the last year, depending on which region they traded in.¹²¹

118 Department of Business and Trade, UK-India CETA Chapter 26: Anti-Corruption, 2025, available at: <https://www.gov.uk/government/publications/uk-india-ceta-chapter-26-anti-corruption>

119 Department for Business and Trade, UK-Australia FTA Chapter 28: Transparency and Anti-Corruption, 2021, available at: <https://www.gov.uk/government/publications/uk-australia-fta-chapter-28-transparency-and-anti-corruption>

120 Department for Business and Trade, UK-New Zealand FTA Chapter 28: Anti-Corruption, 2022, available at: <https://www.gov.uk/government/publications/uk-new-zealand-fta-chapter-28-anti-corruption>

121 Home Office, Economic Crime Survey 2024, available at: <https://www.gov.uk/government/publications/economic-crime-survey-2024>

106. Our ambition is that risks faced by businesses in high-risk markets are mitigated. We will design and implement activities over the next five years to meet this ambition, and have initially agreed the following commitments.
- I. Develop a **toolkit for the UK's diplomatic and trade network**, drawing on public and private sector experience, equipping officials to provide guidance to businesses and engage with host countries on anti-corruption issues affecting British companies (JACU, DBT, FCDO) (priority commitment).
 - II. Continue, where appropriate, to seek robust anti-corruption provisions within our **trade agreements**. Provide for the monitoring and implementation of these provisions after agreements come into force (DBT, JACU) (priority commitment).
 - III. UK Export Finance (UKEF) will partner with like-minded Export Credit Agencies (ECAs) to **promote higher standards of financial crime due diligence for ECAs**, including through participation at the OECD Export Credit Group financial crime expert practitioner meetings and other international fora such as the Berne Union (UKEF).
 - IV. **Review UKEF's public financial crime compliance notices and information** to promote higher levels of awareness of UKEF's financial crime due diligence and requirements among customers, stakeholders and other interested parties, with the end goal of deterring financial crime (UKEF).
 - V. Pilot a programme to **strengthen foreign bribery laws and enforcement** overseas to reduce unfair competition for British businesses when operating internationally (JACU).
 - VI. Improve the flow of **intelligence** about incidents of bribery and corruption from the UK's diplomatic and trade network to law enforcement bodies (JACU, DBT, FCDO, NCA).

Pillar 3:

Global resilience



Pillar 3: Global resilience

Build global resilience to corruption (Objective 3)

107. The third pillar of the strategy seeks to build global resilience to corruption. To do this we will focus our response on **international partnerships** and **international standards**.

3.1: International partnerships

International partnerships drive an effective networked approach to corruption (Outcome 3.1)

108. Corruption is a transnational threat that undermines a wide array of UK international interests. It threatens international security, makes fragile countries more vulnerable to conflict, and leeches vital revenue from low-income countries. It empowers kleptocracy and other forms of authoritarian governance that threaten the rule of law. This erosion of governance undermines business confidence and drives away productive investment, negatively impacting on financial stability and inclusive growth globally. At the same time, many corruption threats to the UK either originate overseas or have a strong international nexus. This is particularly the case with grand corruption, an especially harmful form of corruption that involves the abuse of high-level entrusted power and institutions for private gain.¹²² Proceeds of grand corruption are often laundered through the global financial system where they become integrated into broader webs of illicit and licit finance, making them harder to trace. As a result, the intersection between corruption and broader illicit finance is paramount, requiring an integrated approach.
109. The UK cannot act alone in tackling the threat posed by corruption and illicit finance to the UK and our international interests. Progress in many of the areas outlined in this strategy requires a strong foundation of diverse international partnerships with countries and other partners, including the private sector and civil society, to strengthen defences against shared risks that enable corruption and illicit finance and to reduce the harms they cause.
110. To successfully ensure that international partnerships drive an effective networked approach to corruption, we will focus on **international partnerships**, **reducing harms to development**, and supporting **civil society**, **investigative journalism** and **democratic institutions**.

¹²² See Barrington, R., David-Barrett, E., Dobson Phillips, R. and Garrod, G., 'Grand Corruption' in Dictionary of Corruption, 2024.

Case study: Corruption and defence

A growing evidence base indicates that as defence spending increases, this indirectly increases corruption in the defence sector.¹²³ These links are especially true in countries experiencing state capture, as control of the security sector is one of the main targets for elites. Corruption in the defence sector also works to generate conflict by weakening the state's ability to address security threats. These failures enable human rights abuses, and fuel violence and grievances. The UK is committed to promoting transparency and accountability in such activity, especially given increased defence and security-related spending in Europe in response to Russian aggression.

We can influence this in several ways, including through the Building Integrity UK Programme, which is a MOD-owned and funded capacity building programme, delivering anti-corruption awareness initiatives to foreign governments, UK government departments, and NATO organisations, as part of defence engagement/defence diplomacy.

We will continue to deliver a range of interventions through the Building Integrity UK Programme that aim to reduce the risk of corruption within the defence and security sectors of our international partners, by supporting the implementation of principles related to integrity, transparency, and accountability. This forms part of the UK's wider commitments to enhance international efforts to promote improved security sector governance globally.

UK international partnerships

International coalitions to combat corruption and illicit finance are strengthened with UK support (Outcome 3.1a)

111. Corruption and illicit finance do not respect international borders or established norms. They thrive on exploiting a core strength of the global economy: the ease through which funds can be transferred, and goods and services moved across the world. Financial centres, including the UK, have a particular responsibility to act given their role in providing safe and secure routes for the movement of wealth. Various methods are used to move corrupt and illicit funds, involving a diverse range of countries, actors, and asset classes, for example illicit gold. As countries around the world, including the UK and other financial centres, develop their economies to take advantage of technological

¹²³ Transparency International Defence and Security, Trojan Horse Tactics: Corruption Risk in Defence Spending, 2024, available at: <https://ti-defence.org/wp-content/uploads/2024/04/Trojan-Horse-Tactics-corruption-risk-in-defence-spending.pdf>

developments, from digital currencies to AI, new corruption and illicit finance risks will emerge, further necessitating the need for collaboration.

112. Strong co-ordinated and strategic action between countries, the private sector, and civil society is needed to respond to this networked challenge. This action must span source, transit and destination countries for corrupt funds and illicit finance. Corrupt and criminal actors thrive on exploiting differences in legal and regulatory systems between countries to hide, legitimise, and use illicit wealth for personal, political, or strategic advantage. Robust and long-term international partnerships focused on understanding and tackling shared risks is essential for restricting the space for these actors to operate and thrive. This is a political as well as technical challenge. Many of the solutions to tackling these risks exist, but implementation and enforcement is not as strong as it should be.
113. Our ambition is that UK convening power and partnerships support stronger international coalitions to combat corruption and illicit finance in line with international standards. We will design and implement activities over the next five years to meet this ambition, and have initially agreed the following commitments.
 - I. Host a **UK Countering Illicit Finance Summit** that will convene a broad coalition of governments, multilateral organisations, civil society and the private sector to take action on the shared vulnerabilities that enable corruption and illicit finance to thrive (FCDO) (priority commitment).
 - II. Elevate corruption and illicit finance as a **UK foreign and development policy priority** by embedding these issues across UK engagement strategies in key countries, and using selective Heads of Mission to promote collaboration across posts on shared corruption and illicit finance risks (FCDO) (priority commitment).
 - III. Expand our network of overseas-based **illicit finance experts** and develop new dynamic partnerships with global and emerging financial centres focused on shared risks and tackling new and emerging methodologies for moving corrupt funds and broader illicit finance (FCDO).
 - IV. Scale up the UK's **International Centre of Expertise on Illicit Finance** to understand and develop politically and technically sound responses to international illicit finance and the threat it poses to UK security, plus development and growth internationally (FCDO).
 - V. The UK's **Public Private Partnership (PPP)** function within the NECC will continue to develop its engagement with international PPPs to further the sharing of threat information on economic crime, including corruption, and to continue to advance best practice in utilising partnerships to respond to the threat (NECC, FCDO).

Case study: Illicit finance and corruption in the gold sector

As a concentrated, easily anonymised and high-value commodity, gold is highly vulnerable to corruption and money laundering, exposing the UK's licit gold sector to risks and undermining the UK's position as a centre of the legitimate gold trade. Since Russia's invasion of Ukraine, use of gold to evade sanctions has increased. Corruption in the gold sector facilitates illegal mining, conflict, human rights abuses, development harms, environmental degradation and organised crime.¹²⁴



Overall, illicit gold fuels threats to UK national security and harms our international objectives, for example on development progress, exploiting natural resources for the benefit of an elite and corrupt few. A whole-of-government multi-faceted approach has been mobilised to address vulnerabilities across the gold supply chain. This includes supporting sustainable and conscious formalisation of artisanal mining, championing better adherence to OECD due diligence guidance on responsible sourcing, and collaborating internationally, including through law enforcement, on identifying malign actors and disrupting their activities.

Reducing harms to development

Harms caused by corruption and illicit finance to development are reduced through UK technical support, advocacy and engagement (Outcome 3.1b)

114. Corruption and illicit finance are, at their core, a system of development in reverse.¹²⁵ They undermine stability and security by fuelling conflicts, produce significant losses, and can fundamentally alter the ways in which societies are governed, including when states are captured by a corrupt or criminal elite. Reducing the harms caused by corruption and illicit finance in low- and middle-income countries is more important than ever, particularly in a context where the UK and the international community are working

¹²⁴ RAND, Corruption and Russia's Illicit Gold Trade, 2024, available at: <https://www.rand.org/pubs/commentary/2024/12/corruption-and-russias-illicit-gold-trade.html>

¹²⁵ For example, corruption and illicit finance can contribute to debt distress and macroeconomic instability, deter high quality investment and firm productivity, exacerbate fragility and conflict, and undermine the ability of institutions to deliver services to citizens. Corruption can raise the number of natural disaster-related deaths, including those arising from climate change.

to ensure additional public and private finance is mobilised to end extreme poverty, and respond to the climate crisis in a tight fiscal context.

115. Of particular importance is the need for long-term collaboration with the Global South, to strengthen institutional capability to tackle corruption and illicit finance risks to development outcomes. Tailored support to implement relevant international standards, including to those focused on addressing weaknesses in AML/CTF frameworks, has an important role to play. Stronger transparency and accountability mechanisms, and other innovative approaches, also play a vital role in reducing opportunities for corruption and illicit finance.¹²⁶ This includes strengthened public financial management systems, more effective and independent oversight institutions, and enhanced public scrutiny of budgetary processes, particularly in sectors vital to delivering growth and development, such as public procurement, infrastructure, extractive industries, and climate finance. These measures can help manage corruption risks, attract responsible investment and build citizen-state trust.
116. Commitments outlined in other sections of this strategy will play an important role in reducing harms to development outcomes, including work to support implementation of international standards in global financial centres, advance beneficial ownership transparency and asset recovery, and support law enforcement to investigate grand corruption cases.
117. Our ambition is to reduce harms caused by corruption and illicit finance to development outcomes through UK technical support, advocacy, and engagement. We will design and implement activities over the next five years to meet this ambition, and have initially agreed the following commitments.
 - I. Work with Global South countries to **build long-term capacity to tackle corruption and illicit finance risks**. This will include work by HM Treasury's Technical Assistance Unit to support developing countries in implementing Financial Action Task Force (FATF) Standards, and enhanced UK government collaboration with international financial institutions and regional development banks (HMT, FCDO) (priority commitment).
 - II. Full mobilisation of the **Centre of Expertise for Public Finance**, to support partner countries to build stronger public financial management systems, strengthen independent oversight over how public finances are spent and deepen fiscal accountability (FCDO).
 - III. Deliver policy and programmatic support to tackle corruption in **sectors at high exposure** to corruption risks, including infrastructure and extractive industries (including critical minerals) (FCDO).¹²⁷

126 ACE, A New Approach to Anti-Corruption – When Rule-Breakers rule, 2022, available at: <https://ace.soas.ac.uk/publication/a-new-approach-to-anti-corruption-when-rule-breakers-rule/>

127 ACE, Improving energy access for SMEs in Abuja through horizontal checks and cooperative ownership: a scoping survey, 2025, available at: <https://ace.soas.ac.uk/publication/improving-energy-access-for-smes-in-abuja-through-horizontal-checks-and-cooperative-ownership-and-a-scoping-survey/>

- IV. Reduce corruption risks in **climate finance** by supporting the implementation of anti-corruption measures through British Investment International and the Private Infrastructure Development Group investees, and integrating the public financial management system strengthening support into the Taskforce for Access to Climate Finance (FCDO).
- V. Continue to play a lead role in anti-corruption and defence internationally and in NATO by **investing in the Building Integrity UK Programme** (MOD).

Case study: Building resilience to corruption in Ukraine

The UK has played a strategic, long-term role in supporting Ukraine's anti-corruption architecture, helping to establish and strengthen the National Anti-Corruption Bureau of Ukraine, the Specialised Anti-Corruption Prosecutor's Office, the National Agency for Corruption Prevention, and the Building Integrity, Training and Education Centre. This whole-of-government effort has delivered tangible results, such as high-profile investigations and improved public trust, while embedding a culture of integrity across Ukraine's public institutions. These reforms have been critical to sustaining international confidence and support during wartime, and are directly aligned with Ukraine's ambitions to meet EU accession criteria and NATO standards.

Complementing institutional reform, the UK-US TAPAS Programme supported the creation of the ProZorro e-procurement system and its civil society watchdog DoZorro, which uncovered violations in over 33,000 tenders, saving an estimated \$4.5 billion. The UK also funds the Digital Restoration Ecosystem for Accountable Management (DREAM), a world-leading public investment management platform that, as of March 2025, tracked over 11,200 projects worth £16.7 billion, ensuring transparency and accountability in Ukraine's reconstruction.

Civil society, investigative journalism and democratic institutions

Civil society, investigative journalism and democratic institutions are supported and strengthened to expose corruption and hold corrupt actors to account (Outcome 3.1c)

118. Civil society, independent media and investigative journalism, and democratic institutions play crucial and complementary roles in combatting corruption. Dynamic partnerships between cross-border networks of investigative journalists, civil society, and academics have helped to uncover corrupt networks and their practices in ways that were unimaginable a decade ago.^{128,129,130} Financial institutions and the private sector rely on insights from these groups to understand their exposure to risk and whether and how to engage with specific clients. Law enforcement agencies draw on this work for investigations. Democratic institutions provide a powerful route for accountability, with parliamentarians helping to expose and highlight instances of corruption. Elections provide the public with the opportunity to express their views on governments' performance in tackling corruption.
119. Many of these groups and institutions are coming under sustained attack from corrupt and kleptocratic actors. Internationally those working to expose corruption increasingly experience harassment, intimidation and censorship, placing journalists and civil society groups in direct harm. The Committee to Protect Journalists (CPJ) states that 116 journalists whose coverage included corruption were imprisoned in 2024.¹³¹ In other contexts, some governments have wrongly used AML/CTF laws and regulations to target civil society groups and undermine civic freedoms in the name of effective implementation of FATF Standards.¹³² The UK at the FATF co-led a project in 2023 that clarified relevant standards and guidance in this area. Democratic institutions around the world have been weakening for at least 25 years, undermining efforts to hold corrupt actors to account.¹³³
120. Our ambition is that civil society, investigative journalism and democratic institutions are supported and strengthened to expose corruption and hold corrupt actors to account, even in the most fragile and conflict-affected environments. We will design and implement activities over the next five years to meet this ambition, and have initially agreed the following commitments.

128 See the Global Anti-Corruption Consortium, at: <https://gacc.occrp.org>

129 Royal United Services Institute, 'RUSI and OCCRP partner to tackle sanctions evasion', 2024, available at: <https://www.rusi.org/news-and-comment/rusi-news/rusi-and-occrp-partner-tackle-sanctions-evasion>

130 OCCRP, OCCRP Partners with Leading U.K. Universities to Analyze the Professional Enablers of Corruption, 2024, available at: <https://www.occrp.org/en/announcement/occrp-partners-with-leading-uk-universities-to-analyze-the-professional-enablers-of-corruption>

131 Explore CPJ's database of attacks on the press at: https://cpj.org/data/imprisoned/2024/?status=Imprisoned&coverage%5B%5D=Corruption&start_year=2024&end_year=2024&group_by=location

132 FATF, Unintended Consequences of the FATF Standards, 2021, available at: <https://www.fatf-gafi.org/content/dam/fatf-gafi/reports/Unintended-Consequences.pdf.coredownload.inline.pdf>

133 According to VDEM's latest report, the number of autocracies now exceeds the number of democracies, for the first time in at least 20 years.

- I. Provide **funding to civil society and investigative journalists**, focused on fostering collaboration between local reporters and wider international groups with the help of data innovation to expose high harm corruption and illicit finance risks (FCDO) (priority commitment).
- II. Deliver a series of **strategic dialogues** with civil society and investigative journalists to inform and strengthen HMG's international response to corruption and illicit finance (FCDO).
- III. Expand the work of the UK's **Politics, Governance and Rights Centre of Expertise** to help HMG and our partners better understand and respond to the threats from corruption to democratic institutions, and checks and balances (FCDO).
- IV. Continue to play a leading international role in **championing media freedom, protecting human rights defenders** and civic space. This will include playing a leading role in the Media Freedom Coalition, updating HMG's guidance on supporting human rights defenders, including journalists and those promoting the rule of law and integrating these priorities into HMG strategies (FCDO).

Case study: Danske Bank scandal

On 13 December 2022, USA authorities announced that Danske Bank pleaded guilty to fraud charges and would forfeit \$2 billion. Between 2008 and 2016, Danske Bank's Estonian branch processed \$160 billion through USA banks on behalf of 'non-resident customers', helping them hide their identities by establishing shell companies, and ignoring anti-money laundering controls.



The Organized Crime and Corruption Reporting Project and its partners played a pivotal role in breaking open this money-laundering operation and exposing its scale and severity. Journalists can operate in a different way to law enforcement and governments, making them critical actors in the exposure of illicit activity. With a combination of data analysis and on the ground reporting by a cross-border team, the journalists identified red flags which had been missed by regulators.

3.2: International standards

Key international anti-corruption standards are protected, implemented and enforced effectively (Outcome 3.2)

121. International standards play a vital role in building stronger global resilience to corruption and illicit finance and protecting the UK from the harms they produce. These standards, and the multilateral bodies that serve as their custodians, are vital to building consensus on the technical reforms needed to drive change.
122. Considerable progress has been made over the past two decades to develop more comprehensive international anti-corruption and anti-money laundering standards, alongside a more robust multilateral architecture. In recent years, however, this has come under increasing strain. There have been growing efforts to unpick and dilute this progress, particularly where standards pose a threat to the power of those who engage in or benefit from corrupt or illicit activity. For others, there has been a perception that these standards do not serve the national interest, despite strong evidence on the role anti-corruption reform plays in supporting growth, security, and democratic freedoms.
123. Some other countries, including from the Global South, have criticised the approach to implementation of these standards, underpinned by a perception that their nations are criticised and punished for a lack of progress while weakness in global financial centres remains unaddressed. These pressures have played out across multilateral bodies, including in those that are the custodians of the standards themselves.
124. As outlined across this strategy, the UK will place a particular focus on promoting implementation of standards related to the following four areas.
 - **Bribery:** because it unduly influences decision-making, often fuels further corruption, and directly harms the UK's commercial and strategic interests.
 - **Beneficial ownership transparency:** because of the role that opacity of company ownership and other corporate structures play in concealing and laundering the proceeds of corruption.
 - **Asset recovery and return:** because of the important role this can play in both reducing the incentives for corruption and reducing the harms caused by corruption.
 - **Regulation of professional services sectors** for anti-money laundering: because of the role these sectors can play in supporting corrupt actors to launder money and protect reputations.¹³⁴

¹³⁴ FATF, FATF Recommendations, available at: <https://www.fatf-gafi.org/en/topics/fatf-recommendations.html>

Key international standards bodies

There are a diverse range of international standards designed to combat corruption and money laundering. Of particular importance for this strategy are standards focused on preventing and restricting transnational forms of corruption. The following international standards are key.

- **UN Convention Against Corruption (UNCAC)**, the only legally binding universal anti-corruption instrument.¹³⁵ The Convention covers five main areas: preventive measures, criminalisation and law enforcement, international co-operation, asset recovery, technical assistance and information exchange.
- **OECD Anti-Bribery Convention**, which commits countries to criminalise bribery of foreign public officials and introduce other measures to effectively hold individuals and companies accountable for foreign bribery.¹³⁶
- **Financial Action Task Force (FATF) Standards**, which require countries to implement AML/CTF measures including requiring financial and non-financial sectors in certain circumstances to conduct customer due diligence and report suspicious transactions to authorities.¹³⁷

125. To successfully ensure that key international standards are protected, implemented and enforced we will focus on strengthening global **collective voice, standard setting bodies and implementation and enforcement**.

Collective voice

The collective voice of governments, civil society and those committed to defending international anti-corruption standards is strengthened (Outcome 3.2a)

126. International standards designed to counter corruption and illicit finance are under growing strain. However, the international community's voice across those multilateral fora has not always been unified enough to adequately defend and champion the implementation of international anti-corruption standards. The evolving nature of the corruption threat and its relevance to pressing geopolitical priorities has not been fully recognised in key international fora.

135 United Nations Office on Drugs and Crime, United Nations Convention Against Corruption, 2004, available at: https://www.unodc.org/documents/brussels/UN_Convention_Against_Corruption.pdf

136 OECD, Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, available at: https://www.oecd.org/content/dam/oecd/en/publications/reports/2011/03/convention-on-combating-bribery-of-foreign-public-officials-in-international-business-transactions_037f7856/2bfa620e-en.pdf/_jcr_content/renditions/original/2bfa620e-en.pdf

137 FATF, FATF Recommendations, available at: <https://www.fatf-gafi.org/en/topics/fatf-recommendations.html>

127. In 2023, G7 leaders committed to ‘pursue a stronger and more unified approach in rigorously enforcing international anti-corruption obligations and standards’.¹³⁸ This built on a similar commitment in the UK’s 2021 G7 Presidency, and those made as part of UK membership of the Open Government Partnership (OGP) to promote transparency, accountability and participation in government. The UK is co-chairing the OGP Action Framework Task Force to improve OGP’s rules and guidance, and communications regarding the flexibility of National Action Plans for Open Government, with the goal of making the OGP action framework more user-friendly and adaptable to diverse national contexts.
128. In the coming years, further commitment will be needed to turn this ambition into a reality. This will need to include a concerted G7 effort to understand and respond to the positions of Global South countries. Where the UK hosts future multilateral groupings, this will present important opportunities to foster a stronger collective position on anti-corruption standards and to demonstrate the real-world impact of effective implementation of those standards.
129. Our ambition is that the collective voice of partner governments, civil society, and others committed to defending international anti-corruption standards, is strengthened. We will design and implement activities over the next five years to meet this ambition, and have initially agreed the following commitments.
- I. Support the role of the **United Nations** in tackling corruption through the effective implementation of the UNCAC, working with a range of partners to champion efforts to increase the transparency, accountability, and inclusivity of the Implementation Review Mechanism (JACU, FCDO) (priority commitment).
 - II. Support efforts to widen and **increase participation in standard setting bodies** such as the OECD, GRECO and FATF (HMT, JACU, MoJ, FCDO).
 - III. Use the UK’s position within non-regional bodies such as the **G7, G20, and the Open Government Partnership** to advocate for the protection and enforcement of global anti-corruption standards, and to share good practice and real-world experience between countries (FCDO, JACU, CO).
 - IV. Recommit to defending and **promoting the role of non-government stakeholders**, including civil society, the business sector and academia in international debate and policy formation (FCDO, JACU).

Standard setting bodies

International standard setting bodies are protected and empowered to hold countries to account to fulfil their obligations (Outcome 3.2b)

130. International standards to combat corruption and the proceeds of corruption are only as strong as the bodies mandated to oversee their effective implementation and enforcement. It is vital to ensure relevant bodies have the support, resources,

¹³⁸ G7 Hiroshima Leaders’ Communique, May 2023, available at: https://www.mofa.go.jp/policy/economy/summit/hiroshima23/documents/pdf/Leaders_Communique_01_en.pdf

and capacity to fulfil their mandates in a consistent and risk-based manner, alongside an ability to evolve their frameworks according to evidence and the changing nature of threats. This applies in particular to the OECD Anti-Bribery Convention, FATF, and the Group of States Against Corruption (GRECO) as the key bodies with the ability to hold countries publicly accountable to key global standards. It also includes the UNCAC as the only legally binding universal anti-corruption instrument.

131. Our ambition is to protect and empower international standard setting bodies to deliver their mandates and hold governments to account in fulfilling their obligations. We will design and implement activities over the next five years to meet this ambition, and have initially agreed the following commitments.
- I. Ensure full and consistent implementation of strengthened **FATF** accountability mechanisms for meeting the FATF standards, and support low- and middle-income countries to implement the FATF standards (HMT) (priority commitment).
 - II. Support the **OECD Working Group on Bribery** to increase its membership whilst maintaining its effectiveness and credibility, and to strengthen anti-bribery mechanisms through active participation in the group's evaluations, technical, and country missions (JACU, SFO, NCA, FCDO) (priority commitment).
 - III. Work with countries at **UNCAC** to promote key standards, build diverse coalitions, and share best practice with real world impacts, including by upholding the principles set out in the UK-led joint statement on the Implementation Review Mechanism in 2023 (JACU, FCDO).
 - IV. Actively support the **GRECO** to enhance anti-corruption standards across Europe and beyond, supporting the evaluation round on local corruption, and increase its engagement beyond Europe and with civil society, publishing recommendations (MoJ).

UK-led initiatives

Specific international standards are extended or enforced more effectively through targeted UK-led initiatives overseas (Outcome 3.2c)

132. Making progress on extending or enforcing priority international standards will require co-operation with like-minded partners, to help identify and overcome barriers or bottlenecks to implementation. It will require the UK system to take a coherent and co-ordinated approach across its engagement in all multilateral bodies, as well as aligning bilateral and multilateral programming overseas to tackle corruption and illicit finance around a set of agreed themes.
133. We plan to do this by designing and delivering up to three UK-led initiatives at any one time which focus on implementation or enforcement of specific elements of the four priority international standards set out in this strategy (see paragraph 124). Each of these initiatives will be timebound and focused on measurable objectives. They will draw on the full extent of UK engagement in multilateral and standard setting bodies, and draw on the tactical use of programme funding where needed and available.
134. We expect to work closely with civil society partners and other influential voices overseas in the design and delivery of these UK-led initiatives.

Case study: The Africa Beneficial Ownership Transparency Network (AfBOTN)

The AfBOTN brings together African countries and international partners to accelerate the implementation of beneficial ownership registers and effective use of their data across Africa.



The network was established by FCDO in 2023, working in partnership with the African Development Bank and in response to a G7 commitment to advance beneficial ownership transparency across Africa. AfBOTN is a member-led network, co-chaired by the UK government and the African Development Bank, with Open Ownership acting as secretariat. AfBOTN has 13 members including Nigeria, Kenya and South Africa, and 11 international partner organisations including the African Union, the World Bank, the International Monetary Fund and Open Government Partnership.

As a multi-stakeholder and peer-led initiative, AfBOTN exemplifies an approach to international development based on partnership. By connecting like-minded jurisdiction peers and regional neighbours, it allows for an approach to transparency reform that is user-centred, based on need and local circumstance. Regional networks like AfBOTN also open the door for greater exchange of data within the region, and through a nascent partnership with the African Union, helps to centre the importance of beneficial ownership transparency within a wider policy agenda around tackling illicit financial flows across Africa.

135. Our ambition is that specific international standards are extended or enforced more effectively through targeted UK-led initiatives overseas. To do that we have agreed the following commitment.
 - I. Design and deliver a **rolling programme of up to three UK-led initiatives focused on specific international standards**, developed with like-minded countries and civil society partners, and delivered through UK multilateral engagement and overseas programming (FCDO, JACU, MoJ) (priority commitment).

Cross-cutting



4.1: Implementation

136. Effective implementation will be critical to delivering the impact we are seeking through this strategy. To do this we will focus on **evidence**, and **oversight and transparency**.

Evidence

Evidence on the problem and the UK's response drives policy and operational decision-making (Outcome 4.1a)

137. There are well established challenges to understanding the scale and harms of corruption, as well as in assessing the effectiveness of the system response, and these impact each pillar of this strategy.¹³⁹ Recognising this, the UK has made significant investments to strengthen the evidence base for its international work and shape the global agenda on corruption. This includes investments in the world-leading Anti-Corruption Evidence (ACE) programme and the U4 Anti-Corruption Resource Centre.
138. Domestically, progress has also been made in understanding the scale and nature of corruption experienced in the business environment in recent years, and there is potential for trialling similar approaches to understanding corruption within the public sector.¹⁴⁰ However, while there is stronger understanding of the potential vulnerabilities to corruption in different contexts, there are clear evidence gaps on the extent to which these domestic vulnerabilities are exploited. Similarly, our understanding of offenders, particularly their motivations beyond financial gain, is underdeveloped. Enhancing our knowledge of the pathways through which holders of entrusted power come to abuse it will be critical to identifying how vulnerabilities are exploited in practice and to better informing preventative measures.¹⁴¹
139. Data challenges on corruption and our response to it exacerbate broader evidence limitations. Corruption can enable, or is often one component of, other serious crimes. It is under-reported or reported as other crime types (e.g. fraud), and there is no single corruption offence in the UK or separate estimate of corruption across government. These issues have hindered the government's ability to monitor corruption effectively, as noted by the National Audit Office.¹⁴² Furthermore, relevant enforcement data is dispersed across multiple organisations, stored in varied formats, and often recorded in ways that hinder efficient sharing and analysis. Even where data exists, it is not consistently shared or analysed in a way which delivers value across the system.

139 University of Sussex, Centre for the Study of Corruption, International approaches to recording corruption and monitoring intervention outcomes at the national level, available at: <https://www.gov.uk/government/publications/international-approaches-to-recording-and-monitoring-corruption>

140 Home Office, Economic Crime Survey 2020, available at: <https://www.gov.uk/government/publications/economic-crime-survey-2020/economic-crime-survey-2020> and Home Office, Economic Crime Survey 2024, available at <https://www.gov.uk/government/publications/economic-crime-survey-2024>

141 See Home Office and NECC, Economic Crime Areas of Research Interest, 2025, available at: <https://www.nationalcrimeagency.gov.uk/who-we-are/publications/755-economic-crime-areas-of-research-interest-ari-report-july-2025/file>

142 National Audit Office, Tackling fraud and corruption against government, 2023, available at: <https://www.nao.org.uk/wp-content/uploads/2023/03/tackling-fraud-and-corruption-against-government.pdf>

Addressing these issues requires a targeted, long-term approach, aligned with the measures set out in the forthcoming Economic Crime Data Strategy, to be published in 2026.

140. Given the challenges related to corruption evidence and data, robustly assessing performance is difficult. We will adopt a proportionate and iterative approach to tracking progress throughout this strategy's implementation period. Our strategy-level outcomes framework (at Annex B) outlines the overarching change we aim to deliver. Work is underway to develop this further at the pillar and strand levels through a theory of change approach, and we will use this to agree a measurement plan with partners. In addition to improving data collection, we will use proxy indicators, structured professional judgement, and output/activity measures to assess progress. This approach will also help identify areas suitable for more targeted evaluation and will align with work already undertaken for ECP2.
141. Our ambition is that evidence and insight on the problem and UK response drives policy and operational decision-making. We will use this strategy to improve the evidence base in tangible ways over the next five years, tracking the corruption threat in a more structured way and work to identify and close evidence gaps. The UK policy definition of corruption provides clarity on scope, and the commitments in this section will help to identify the key evidence gaps and co-ordinate the response to them.¹⁴³ We will design and implement activities over the next five years to meet this ambition, and have initially agreed the following commitments.
 - I. Pilot a new **Corruption Research and Evidence Hub (Hub)** to improve system understanding of the corruption problem and our response (JACU) (priority commitment).
 - II. Focus research across the analytical system on an agreed set of **priority evidence gaps** which are reviewed at least annually, drawing on relevant evidence from analytical teams, academics, and civil society (Hub, FCDO, NECC).
 - III. **Identify and map existing data** that relates to identified evidence priorities through collaboration between the Hub and key partners (Hub, FCDO, NCA, SFO, CoLP and PSFA).
 - IV. Improve understanding of the **impact** of corruption on the UK through targeted research, including in-depth harm analysis of investigated corruption cases (Hub, NCA, CoLP, SFO).
 - V. **Consolidate system insights** into a unified product which informs implementation of this strategy, and track the corruption **problem** at both the strand and strategy level, through development and monitoring of key indicators (Hub, FCDO).
 - VI. Understand the impacts of our **response**, with an initial measurement framework agreed with partners within six months of this strategy being published, and progress assessments independent from delivery teams, with targeted evaluation where appropriate (Hub, JACU, FCDO).

¹⁴³ The abuse of entrusted power for private benefit that usually breaches laws, regulations, standards of integrity and/or standards of professional behaviour. See Annex A: UK policy definition of corruption.

The Anti-Corruption Evidence (ACE) programme

The ACE programme represents a significant UK investment in public good research. ACE delivers practical research and directly informs strategy, policy, operations, and programming for the UK government and beyond.

The ACE programme has three components:

- GI-ACE researches illicit finance, enablers, corruption in emergency measures, trade and state capture¹⁴⁴
- SOAS-ACE researches anti-corruption in infrastructure, power, health, education, climate change investments, digital government service delivery and political corruption¹⁴⁵
- SOC-ACE researches organised crime, illicit finance, kleptocracy and transnational threats¹⁴⁶

This research is having real and global impact. ACE research used big data to identify procurement ‘red flags’ and was taken up by the governments of Uganda and Jamaica, alongside the World Bank, as an internal risk control instrument.¹⁴⁷ This is helping to protect UK investments overseas. The benefits of leveraging data in anti-corruption efforts are further reinforced by recent GI-ACE work where multiple datasets were used to map illicit financial flows thereby identifying where anti-corruption interventions should be targeted.¹⁴⁸

Oversight and transparency

The strategy is implemented transparently and effectively across government (Outcome 4.1b)

142. The strategy is owned jointly by HO, FCDO and HMT, with implementation co-ordinated by JACU in HO. The Security Minister is the lead minister accountable for delivery of the overall strategy to Parliament, working closely with ministerial colleagues in the FCDO and HMT. A ministerial steering board will meet to set direction and provide accountability for delivery. Ministers will be supported by the Anti-Corruption Champion.

144 See GI-ACE, <https://giace.org>

145 See SOAS-ACE, <https://ace.soas.ac.uk>

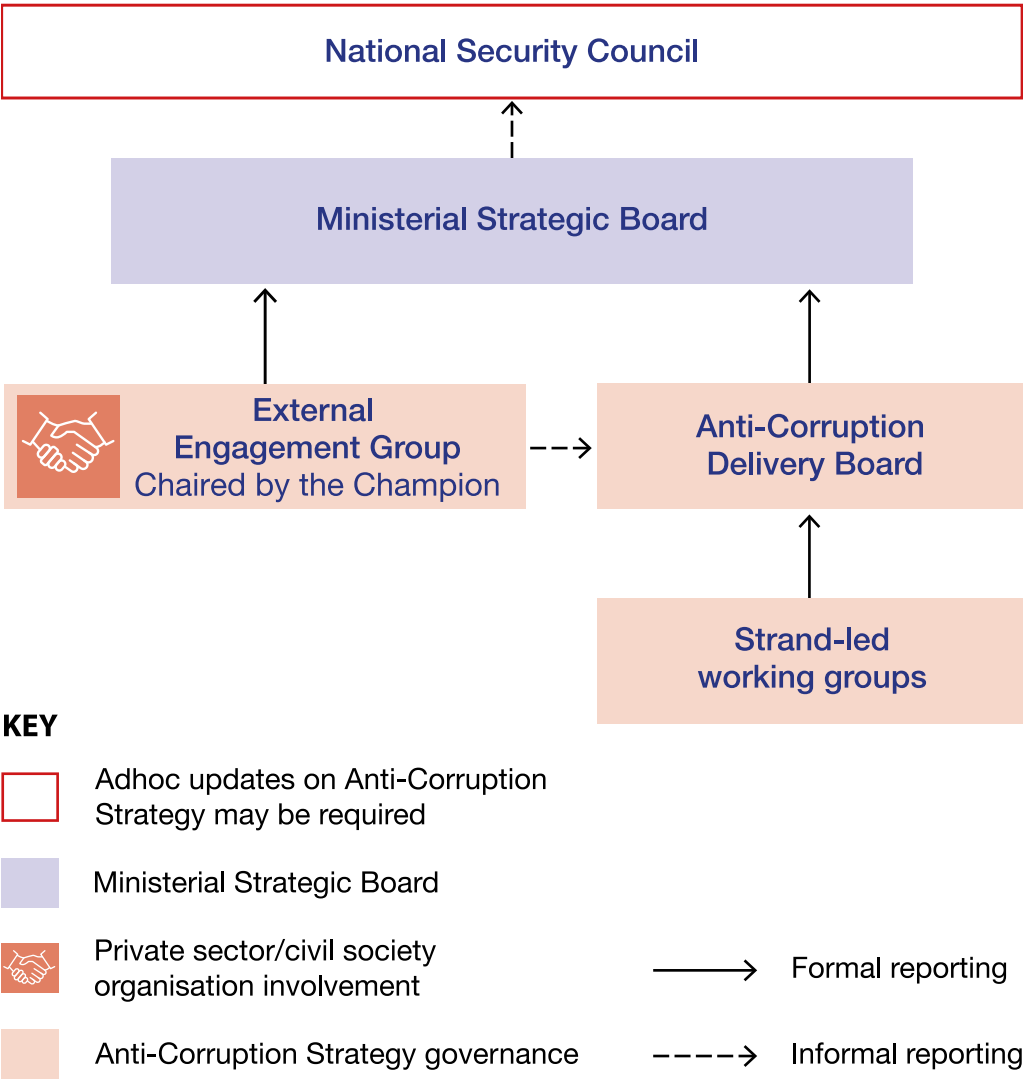
146 See SOC-ACE, <https://www.socace-research.org.uk>

147 GI-ACE Governance and Integrity Anti-Corruption Evidence, Curbing corruption in procurement using ‘red flags’ risk indicators, available at: <https://giace.org/projects/procurement/>

148 GI-ACE Governance and Integrity Anti-Corruption Evidence, From Secrecy to Scrutiny: A New Map of Illicit Global Financial Networks and Regulation, 2024, available at: <https://giace.org/resources/from-secrecy-to-scrutiny-a-new-map-of-illicit-global-financial-networks-and-regulation/>

143. This strategy involves delivery by multiple teams across government and law enforcement agencies. To ensure coherent delivery, a director-level delivery board will meet regularly, with oversight of delivery via thematic working groups as needed. This officials-led governance will provide accountability to ministers, provide oversight on progress and performance, address delivery risks and respond to the changing threat. This governance will align with current implementation of ECP2 and with future governance of economic crime.

Figure 4:



144. We will seek to be transparent on the progress we make in delivering the commitments, and the overall change we are seeking through this strategy. The principles of transparency and independent oversight run through the commitments across many strands of this strategy. We plan to deliver this strategy with external partners, and see close working as key to its successful implementation. We will establish an external advisory group, chaired by the Champion, to provide regular updates to key civil society, academic, and private sector partners, along with parliamentarians from the All-Party Parliamentary Group on Anti-Corruption and Responsible Tax (APPG).

145. Our ambition is that this strategy is implemented transparently and effectively across government. To do that this we have agreed the following commitments.
- I. Provide **regular updates to external partners** via the Champion-led External Engagement Group, including civil society, academia, private sector, and the APPG (JACU) (priority commitment).
 - II. Publish an **annual progress update** on GOV.UK with a high-level summary of progress made against the commitments in this strategy and provide a written ministerial statement to Parliament (JACU) (priority commitment).¹⁴⁹
 - III. Publish **two in-depth progress assessments** at end of year three (mid-point) and year five (end point) of this strategy, and their agreed terms of reference, on GOV.UK (JACU) (priority commitment).
 - IV. Provide **leadership across HMG** to ensure successful delivery of the strategy commitments and ensure effective oversight by ministers on progress against the agreed outcomes, including through effective cross-system governance (JACU).

Prime Minister's Anti-Corruption Champion

Since 2006, Prime Ministers have appointed Anti-Corruption Champions to advocate for government action to tackle corruption.

The Prime Minister appointed Baroness Margaret Hodge as Anti-Corruption Champion for the duration of this Parliament.¹⁵⁰

The Champion will support ministers in implementing the strategy, lead engagement with external partners and parliamentarians, and provide support to ministers on specific policy areas, including supporting delivery of international work.

149 See Annex C: Commitments dashboard.

150 HMG, New Anti-Corruption Champion and NCA funding as campaign against corruption steps up, 2024, available at: <https://www.gov.uk/government/news/new-anti-corruption-champion-and-nca-funding-as-campaign-against-corruption-steps-up> and Home Office, Prime Minister's Anti-Corruption Champion: terms of reference, 2024, available at: <https://www.gov.uk/government/publications/prime-ministers-anti-corruption-champion-terms-of-reference-and-letter-of-appointment/prime-ministers-anti-corruption-champion-terms-of-reference>

Annex A: UK policy definition of corruption

UK definition of corruption

Corruption is the abuse of entrusted power for private benefit that usually breaches laws, regulations, standards of integrity and/or standards of professional behaviour.

Explanatory notes

For the purposes of this definition:

‘Entrusted power’ is:

- the power or duty vested in a trusted role, which includes public office or roles in the private or non-profit sectors (but excludes domestic settings)
- held by an individual or institution that exercises discretionary power in relation to another person or entity, or where the abuse of their role would undermine a system of integrity

An ‘abuse’:

- is an improper exercise of power or violation of duties associated with a trusted role, either through action or inaction
- does not necessarily have to be illegal to be corruption and can include a breach of regulations, standards of integrity and/or standards of professional behaviour
- can also include a pattern or aggregation of activities which amount to a collective abuse

‘Private benefit’ includes:

- (financial and non-financial) personal gains that accrue to individual(s) or their personal acquaintance(s)
- partisan gains that benefit an organisation, favoured group or individual
- the avoidance of losses
- gratification gained through inflicting harm on others

Corruption is not:

- activity or decisions deemed to be unwise merely with the benefit of hindsight
- activity that breaches law, regulations, standards of integrity and/or standards of professional behaviour that are unconnected to the entrusted power
- activity that is merely undertaken for convenience or is an inefficient or ineffective use of that power

Background

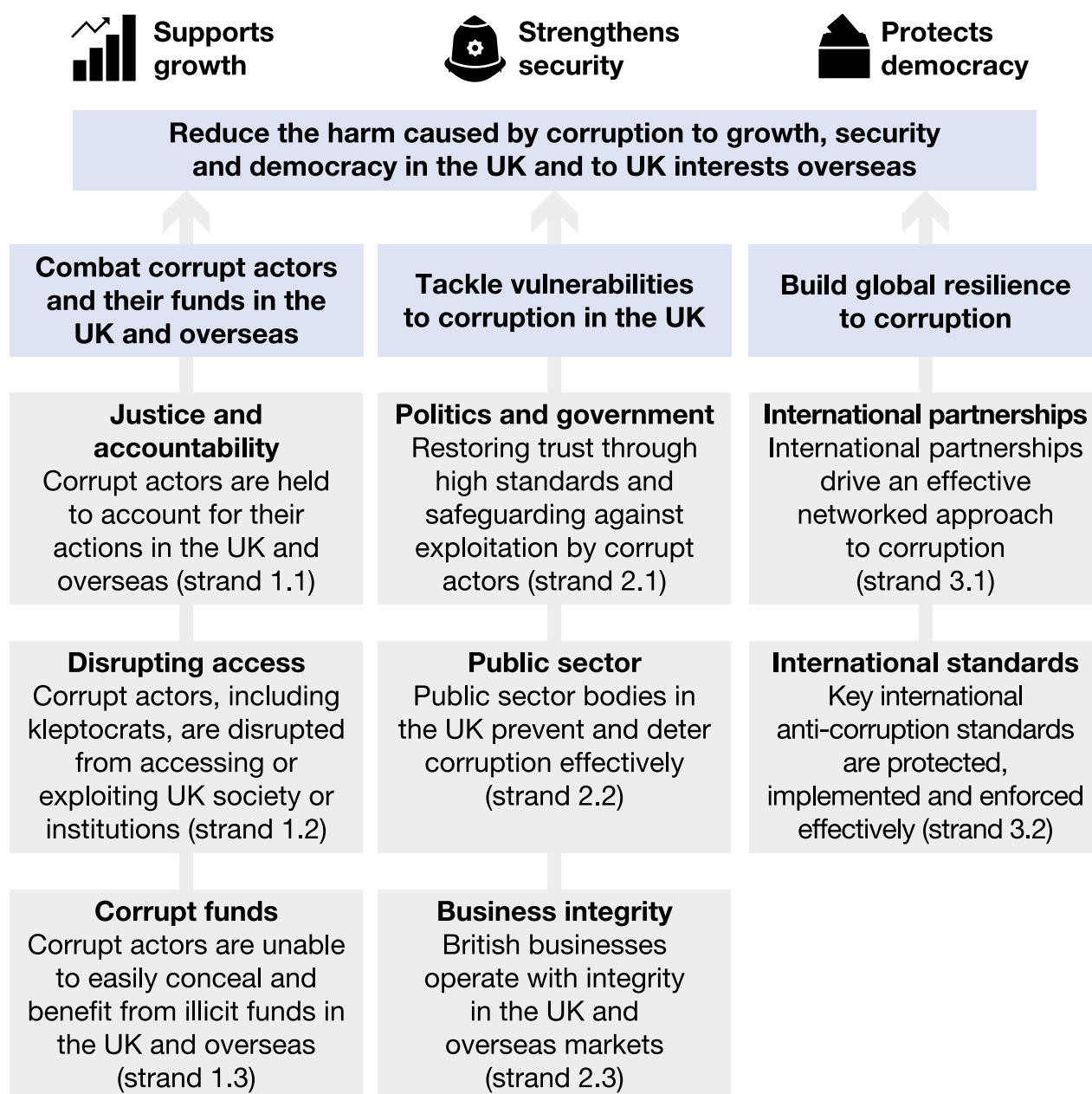
1. JACU, in collaboration with the University of Sussex's Centre for the Study of Corruption, has developed the above definition of corruption. It has been tested across the UK government and with external stakeholders. Corruption is a complex issue, and any definition of corruption will necessarily rely on explanatory notes to reduce variation in interpretation.
2. There is no international consensus on the definition of corruption, but establishing a common policy definition for the UK government supports:
 - policy development – by setting the scope of the strategy, and managing grey areas on what is/is not corruption
 - evidence collection – providing parameters for measurement and, where relevant, helping to disaggregate corruption from broader crime and misconduct statistics
3. As a policy definition, it is not intended to have any legal application and will not to be put on statutory basis or create any new offence. A policy definition will necessarily be broader than any legal definition, as conduct may be corrupt even if it does not explicitly break laws or rules.

Core principles

4. We have agreed a set of core principles underpinning the definition:
 - I. **Corrupt acts are not all criminal offences**
They may breach regulatory or integrity standards, or workplace codes of conduct, where disciplinary action might be the most appropriate response.
 - II. **Corruption is not limited to the public sector**
Any abuse of position, power, authority or responsibility can be potential corruption, whether in the public sector, private sector or voluntary sector. It is important, however, that we exclude purely personal settings; anti-corruption work does not cover domestic situations.
 - III. **Corruption need not benefit the corrupt actor directly**
Corruption may benefit a friend, family member or other associate of the person committing the corruption, or it may benefit an organisation, a political party, a state or even an ideology.
 - IV. **Benefits of corruption need not be financial**
Corrupt acts are often committed for anticipated financial gain, but might also be committed for other reasons, for example sexual gratification or political gain. They may also be committed to avoid loss, such as reputational damage.
 - V. **Wrongdoing needs to be connected to the entrusted power**
If, for example, an official who holds entrusted power has broken the law through a traffic offence, this alone will not be a corrupt act. If that official then seeks to use their entrusted power to avoid being held to account, this would amount to corruption.
 - VI. **Disagreeing with an act does not make it corrupt**
Someone may not agree with the act of the office holder; they may feel it is inefficient, ineffective or unwise, but this does not necessarily mean that it is corrupt.

Annex B: Strategy outcomes

Summary of the UK anti-corruption response



Outcomes framework

Objective: Reduce the harm caused by corruption to growth, security and democracy in the UK and to UK interests overseas

Pillar 1: Combat corrupt actors and their funds in the UK and overseas

1.1 Justice and accountability

Corrupt actors are held to account for their actions in the UK and overseas

- 1.1a Potential corrupt activity is **identified** early with **referrals** triaged and co-ordinated effectively by enforcement agencies
- 1.1b **Enforcement** agencies investigate corrupt actors effectively to prevent harm to victims, the UK and its interests overseas
- 1.1c Corrupt actors are brought to **justice** in a proportionate and timely way

1.2 Disrupting access

Corrupt actors, including kleptocrats, are disrupted from accessing or exploiting UK society or institutions

- 1.2a Corrupt elites are prevented from entering UK **borders**
- 1.2b UK **institutions** are protected against abuse by corrupt elites
- 1.2c The UK response to financial crime, including **legislation**, is equipped to respond to the threat from kleptocracy

1.3 Corrupt funds

Corrupt actors are unable to easily conceal and benefit from illicit funds in the UK and overseas

- 1.3a Opportunities to obscure corrupt funds through **complex ownership** structures are substantially reduced
- 1.3b **Assets** are recovered and used to reduce harms of corruption overseas
- 1.3c **Professional enablers** who support corrupt actors are disrupted and held to account

Cross-cutting

4.1a Evidence

Evidence on the problem and the UK's response drives policy and operational decision-making

4.1b Oversight and transparency

The strategy is implemented transparently and effectively across government

Objective: Reduce the harm caused by corruption to growth, security and democracy in the UK and to UK interests overseas

Pillar 2: Tackle vulnerabilities to corruption in the UK

2.1 Politics and government

Restoring trust through high standards and safeguarding against exploitation by corrupt actors

2.1a High **standards in public life** are restored

2.1b Safeguards protect against corrupt actors exploiting the UK's **political financing** framework

2.2 Public sector

Public sector bodies in the UK prevent and deter corruption effectively

2.2a Corruption risks in **local government** are identified and addressed

2.2b Corrupt **insiders** are identified effectively and prevented from working in high-risk public sector bodies

2.2c Corruption risks in public sector **procurement** are mitigated and addressed

2.2d Corruption risks are proactively identified and acted on by public sector **leaders and officials**

2.3 Business integrity

British businesses operate with integrity in the UK and overseas markets

2.3a British **businesses** are able to identify and act on bribery and corruption risks in the UK and overseas

2.3b Bribery and corruption risks faced by British businesses in high-risk **overseas markets** are mitigated

Cross-cutting

4.1a Evidence

Evidence on the problem and the UK's response drives policy and operational decision-making

4.1b Oversight and transparency

The strategy is implemented transparently and effectively across government

Objective: Reduce the harm caused by corruption to growth, security and democracy in the UK and to UK interests overseas

Pillar 3: Build global resilience to corruption

3.1 International partnerships

International partnerships drive an effective networked approach to corruption

3.1a **International coalitions** to combat corruption and illicit finance are strengthened with UK support

3.1b **Harms** caused by corruption and illicit finance to development are reduced through UK technical support, advocacy and engagement

3.1c **Civil society, investigative journalism and democratic institutions** are supported and strengthened to expose corruption and hold corrupt actors to account

3.2 International standards

Key international anti-corruption standards are protected, implemented and enforced effectively

3.2a The **collective voice** of governments, civil society and those committed to defending international anti-corruption standards is strengthened

3.2b International **standard setting bodies** are protected and empowered to hold countries to account to fulfil their obligations

3.2c Specific international standards are extended or enforced more effectively through targeted **UK-led initiatives** overseas

Cross-cutting

4.1a Evidence

Evidence on the problem and the UK's response drives policy and operational decision-making

4.1b Oversight and transparency

The strategy is implemented transparently and effectively across government

Annex C: Summary of commitments

1.1 Justice and accountability	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
Identification and referrals (Outcome 1.1a)	1.1.1	Review the current system for reporting potential corruption within the UK to identify ways to make this easier and better co-ordinated, including better alignment with existing economic crime referral systems	Priority	JACU	2026
	1.1.2	Expand the National Economic Crime Centre (NECC) Bribery and Corruption clearing house to provide robust deconfliction and tactical oversight of the most significant corruption cases in the UK, including a single approach to risk scoring, a register of cases and case reporting every six months	Priority	NECC, NCA, JACU	2026
	1.1.3	Consider the findings of the Independent Review of Disclosure and Fraud Offences (part two) which includes the incentivisation of whistleblowers in economic crimes , and assess the feasibility of introducing financial incentive schemes and support for individuals reporting economic crime	Priority	HO, JACU, SFO, HMT, FCDO, DBT, PSFA	2026
	1.1.4	Explore opportunities to reform the UK's approach to whistleblowing in the employment context	Priority	DBT	2027

1.1 Justice and accountability	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
Enforcement (Outcome 1.1b)	1.1.5	Expand the DCU to investigate national and regional corruption cases in the UK, focusing on key at-risk sectors, and supporting ROCUs' and local forces' cases	Priority	JACU, CoLP	2027
	1.1.6	Continue support for the NCA's ICU and strengthen collaboration with the unit's partner countries on investigations to improve evidence	Priority	FCDO, NCA	Ongoing
	1.1.7	Continue support for the IACCC so it has a larger UK law enforcement membership and can raise its profile in international fora, and increase resourcing and members from other countries	Priority	FCDO, NCA	Ongoing
	1.1.8	In the context of Spending Review 2025, explore the funding landscape with the aim of strengthening economic crime enforcement	Priority	HMT, HO	2026
	1.1.9	Speed up the SFO's investigations, through a more efficient investigative process and the use of artificial intelligence and machine learning , and share wider lessons learned that could be adopted and integrated across the system	Priority	SFO	Ongoing
	1.1.10	Pilot a prototype artificial intelligence corruption investigation assistant to improve support for operational delivery in ROCUs and local forces on local corruption cases		JACU, CoLP, CoP, ROCUs	2027

1.1 Justice and accountability	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
Enforcement (Outcome 1.1b)	1.1.11	Co-ordinate law enforcement communications activity to raise awareness with individuals and industry to protect against future corruption risks		NECC	Ongoing
	1.1.12	Develop a training and support package for low-income countries on the use of international co-operation tools in anti-corruption cases		FCDO, UKCA	2028
	1.1.13	Deliver the new international anti-corruption prosecutorial taskforce to develop an enhanced operational partnership between the SFO and its key international partners		SFO	2026
	1.1.14	Pursue strengthened enforcement through the Public Sector Fraud Authority's (PSFA) Enforcement Unit Pilot by investigating public sector fraud on behalf of public authorities and referring bribery and corruption cases to relevant agencies, subject to powers granted under the Public Authorities Fraud, Error and Recovery Bill		PSFA	Ongoing

1.1 Justice and accountability	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
Justice (Outcome 1.1c)	1.1.15	Subject to the government's response to the Independent Review of Disclosure and Fraud Offences 'Disclosure in the Digital Age', we will implement, subject to funding, agreed recommendations to ensure the disclosure regime facilitates, not hinders, swift justice including in corruption cases	Priority	HO, AGO, MoJ	2029
	1.1.16	Scope and launch an end-to-end review of concluded bribery cases , to identify common barriers to resolving cases, including reviewing personal consent requirements		JACU, SFO	2027
	1.1.17	In line with Law Commission recommendations, we will proceed (through the Public Office (Accountability) Bill) to abolish the current common law offence of Misconduct in Public Office and replace it with two new statutory offences of breach of duty in public office and seriously improper acts in public office		MoJ	2026

1.2 Disrupting access	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
Borders (Outcome 1.2a)	1.2.1	Develop improved operational capability to disrupt corrupt elites and their enablers from accessing the UK , by integrating and improving the response at the border as our first line of defence, and increasing the capabilities of immigration teams in the HO	Priority	HO	2027
	1.2.2	Continue to tackle abuse of residency or citizenship by investment schemes, which could include introducing visa requirements when necessary, and through upstream international engagement work to reduce the illicit finance risk		HO	Ongoing
	1.2.3	Consider enhanced immigration measures to target corrupt elites and their enablers, on the grounds of protecting national security and combatting corruption		HO	2025
Institutions (Outcome 1.2b)	1.2.4	Implement the economic crime-related SLAPPs measures in the Economic Crime and Corporate Transparency Act 2023	Priority	MoJ	2025
	1.2.5	Informed by wider evidence available on SLAPPs, consider the future approach for comprehensively tackling all SLAPPs	Priority	MoJ	2029
	1.2.6	Encourage national institutions , including cultural and civic organisations, to strengthen resilience to corruption and illicit finance risks from high-value donations	Priority	DCMS, HO, DfE	Ongoing

1.2 Disrupting access	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
Institutions (Outcome 1.2b)	1.2.7	Support the Independent Football Regulator to strengthen its corruption and illicit finance capabilities, including through enhancing the regulator's affiliation with law enforcement	Priority	DCMS, JACU	2027
	1.2.8	Raise awareness and improve understanding in the UK law enforcement system of the corruption threat in sport		JACU	2030
	1.2.9	Engage with bodies and professions within football to promote higher standards of conduct and compliance		DCMS, JACU	2030
Legislation (Outcome 1.2c)	1.2.10	Review the effectiveness of the UK's existing efforts to combat kleptocracy , including our response to financial crime from legislation to enforcement, and the use of sanctions, with any recommendations considered through the appropriate channels	Priority	HO, HMT, FCDO	2028

1.3 Corrupt funds	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
Transparency of ownership (Outcome 1.3a)	1.3.1	Continue working with the CDs and OTs to enhance beneficial ownership transparency , including the implementation of registers with broad and inclusive legitimate interest access in line with UK expectations, as an interim step to public registers. The UK anticipates this will be delivered in line with commitments made at the Joint Ministerial Council in November 2024 for the OTs, and for the CDs, implementation aligned with the EU's July 2026 deadline	Priority	FCDO, JACU	2026
	1.3.2	The Anti-Corruption Champion will lead a comprehensive evidence-based government review of asset ownership in the UK to identify if there are any vulnerabilities and gaps, working with law enforcement and other agencies to explore how to enhance data interoperability and utility	Priority	HO	2026
	1.3.3	Develop a robust evidence base on the use of beneficial ownership data, beyond anti-money laundering and counter-terrorist financing, in collaboration with business representative organisations, civil society and multilateral organisations, to foster a trusted business environment, enhance investor confidence and drive sustainable economic growth	Priority	FCDO, DBT	Ongoing

1.3 Corrupt funds	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
Transparency of ownership (Outcome 1.3a)	1.3.4	Improve access for UK law enforcement agencies and other relevant UK competent authorities to beneficial ownership information on overseas entities by developing agreements on the timely and effective exchange of beneficial ownership information between the UK and key international jurisdictions	Priority	JACU	2027
	1.3.5	Work more closely with international partners to support wider access to beneficial ownership data, ideally through public registers of company ownership and central registers of trust ownership, and better use of quality data through wider uptake of the Beneficial Ownership Data Standard		FCDO	Ongoing
	1.3.6	Offer tailored, expert-led technical assistance to support jurisdictions to build stronger beneficial ownership frameworks and reduce vulnerabilities to illicit finance and corruption		DBT, FCDO	Ongoing
International asset recovery (Outcome 1.3b)	1.3.7	Provide enhanced support to affected states in tracing and recovering stolen assets		HO, FCDO, NCA	Ongoing
	1.3.8	Continue to support the capacity building of affected states, to improve the sustainability of asset recovery capabilities		HO, FCDO, NCA	Ongoing
	1.3.9	Explore how we can further utilise the private sector and civil society to increase asset recovery capacity and capabilities		HO	2026

1.3 Corrupt funds	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
International asset recovery (Outcome 1.3b)	1.3.10	Consider current UK policies and procedures for compensating victims of foreign bribery and make recommendations for reform		HO	2027
	1.3.11	Publish guidance on existing routes to compensation , which will explain terminology and signpost potential victims to the most appropriate options		HO	2027
Professional enablers (Outcome 1.3c)	1.3.12	Fund a dedicated professional enablers co-ordinator to provide enhanced co-ordination to the PURSUE response while exploring other options to build capacity and capability to improve the operational response to professional enablers	Priority	NECC, JACU	Ongoing
	1.3.13	Take action to mitigate risks in the high-risk sectors identified in the National Risk Assessment . This will include consulting on adding new regulated activities to the money laundering regulations over the lifetime of the strategy	Priority	HMT, HO	Ongoing
	1.3.14	Enhance HM Government's (HMG) understanding of the threat from international professional enablers in fuelling corruption and illicit finance, through new analytical collaborations between HMG and external partners		NECC, FCDO, OPBAS	Ongoing

1.3 Corrupt funds	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
Professional enablers (Outcome 1.3c)	1.3.15	Expand the use of sanctions , alongside existing law enforcement tools, to target professional enabler networks. Strengthen the UK sanctions system to further restrict the ability of professional enablers to move the proceeds of corruption		FCDO, HMT	Ongoing
	1.3.16	Deepen HMG's partnership with jurisdictions also exposed to professional enabler risks, focused on encouraging and supporting information sharing, strengthening supervision and supporting operational co-operation		FCDO, NECC, OPBAS	Ongoing
	1.3.17	Strengthen public and private sector collaboration and awareness on the threat and risks posed by professional enablers of corruption through the NECC's Joint Money Laundering Intelligence Taskforce model and other forums, in particular by improving the identification and reporting of enabling activity		HO, FCDO, NECC, OPBAS	Ongoing

2.1 Politics and government	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
Standards in public life (Outcome 2.1a)	2.1.1	Establish an Ethics and Integrity Commission to strengthen probity in public life by strengthening and reforming the Committee on Standards in Public Life, creating an authoritative body with a mandate to drive up ethical standards across the public sector	Priority	CO	2025
	2.1.2	Implement the Public Office (Accountability) Bill to ensure openness and transparency across the public sector, including its planned obligation for all public bodies to have a code of ethical conduct, supported by the Ethics and Integrity Commission as a Centre of Excellence on public sector codes of conduct	Priority	CO	Ongoing
	2.1.3	Strengthen the Business Appointments system by closing the Advisory Committee on Business Appointments and moving its functions to other bodies, streamlining the system and enhancing compliance by introducing new sanctions for breaches of the rules	Priority	CO	2025
	2.1.4	Reform ministerial severance payments by introducing a new minimum service requirement of six months for ministers to receive severance payments, with the expectation that ministers will forgo payments if leaving office following a serious breach of the Ministerial Code		CO	2025
	2.1.5	Consider the recommendations of the Committee on Standards report on MPs' outside interests		CO	Ongoing

2.1 Politics and government	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
	2.1.6	Continue to keep transparency around lobbying under review , factoring into consideration the recommendations from the Public Administration and Constitutional Affairs Committee's report as any policy reforms are considered		CO	Ongoing
Political donations (Outcome 2.1b)	2.1.7	Strengthen rules on company political donations	Priority	MHCLG	Ongoing*
	2.1.8	All donors to make a declaration around any connected sources of funding to deter proxy donations	Priority	MHCLG	Ongoing*
	2.1.9	Introduce new requirements on those receiving political donations to undertake risk assessments, with the Electoral Commission producing guidance on enhanced due diligence		MHCLG	Ongoing*
	2.1.10	Increase reporting requirements for unincorporated associations to increase transparency around their funding		MHCLG	Ongoing*
	2.1.11	Give the Electoral Commission responsibility for enforcing candidate and local third-party campaigner election finance offences rather than non-specialist police		MHCLG	Ongoing*
	2.1.12	Increase the Electoral Commission's maximum fining powers		MHCLG	Ongoing*

*As soon as parliamentary time allows

2.2 Public sector	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
Local government (Outcome 2.2a)	2.2.1	Establish a new statutory and independent Local Audit Office in England to improve audit system transparency and quality control, contributing to greater accountability and strengthening scrutiny in relation to the misuse of public funds	Priority	MHCLG	2026
	2.2.2	Subject to separate agreement, in England introduce a new mandatory Code of Conduct for elected local government officials through legislation, including robust sanctions for breaches, and explore additional powers to strengthen the Code to uphold integrity standards in local government	Priority	MHCLG	2028
	2.2.3	Subject to separate agreement, consider establishing independent oversight for England on local government standards to provide assurance of appeals processes		MHCLG	2028
Insider threat (Outcome 2.2b)	2.2.4	Support the establishment of a national integrity screening capability for policing to improve public trust, enhance confidence, and reduce harm to our communities, while also exploring its potential to strengthen workforce assurance across the wider public sector	Priority	HO, NPCC	2025
	2.2.5	Pilot the feasibility of utilising Police National Database data in National Security Vetting	Priority	CO, UKSV	2025

2.2 Public sector	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
Insider threat (Outcome 2.2b)	2.2.6	Ensure police forces can easily access and share relevant information about applicants or transfers from the armed forces and other government agencies, so they have a full picture of each person's background	Priority	HO, CoP, NPCC	2026
	2.2.7	Issue UK government Insider Risk Guidance outlining the best strategies and approach to managing insider risk and common activities and procedures for UK public bodies		CO	2025
	2.2.8	Exempt Border Force and Immigration Enforcement staff from the Rehabilitation of Offenders Act to ensure disclosure of spent convictions		Border Force, Immigration Enforcement	2026
	2.2.9	Implement additional integrity checks on new staff at Border Force or those renewing security clearance, and expand integrity checks to existing staff		Border Force	2026
	2.2.10	In prisons and probation , develop an enhanced Counter Corruption Prevent Strategy, a refreshed Corruptor Management Strategy, and a refreshed conflict of interest process		HMPPS	2027

2.2 Public sector	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
Insider threat (Outcome 2.2b)	2.2.11	In law enforcement , create barred and advisory lists for the NCA, Civil Nuclear Constabulary, British Transport Police and Ministry of Defence Police and ensure that policing bodies do not employ or appoint anyone on those lists. Also consider using further legislative powers to create barred and advisory lists for other law enforcement agencies		HO, DESNZ, DfT, MOD	2026
	2.2.12	In defence , improve the processes and standards in vetting, implementation of a joint vetting centre, and improved data capability to monitor, detect and predict insider risk		MOD	2027
	2.2.13	Within the Civil Service , broaden the Internal Fraud Hub (formerly the Internal Fraud Database) beyond fraud and illicit financial gain to capture individuals dismissed for corruption-type offences		PSFA	2026

2.2 Public sector	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
Procurement (Outcome 2.2c)	2.2.14	Monitor participation rates of procurement training and evaluate the effectiveness of learning and development products	Priority	CO	Ongoing
	2.2.15	Ensure compliance of the transparency regime under the Procurement Act 2023 and monitor data quality		CO	Ongoing
	2.2.16	Improve access to, and use of, procurement data for public reporting, and work with government stakeholders to shape transparency analytics and, if appropriate, make available in the public domain		CO	2026
	2.2.17	Plan to review and evaluate the effectiveness of the debarment regime , which allows ministers to list suppliers whose past conduct or circumstances disqualify them from public procurement		CO	Ongoing
	2.2.18	Monitor the contracting authority landscape through referrals and internal reports to the PRU, allowing for oversight and, where appropriate, recommending actions to improve compliance, including anti-corruption measures, with the Procurement Act		CO	Ongoing
	2.2.19	Analyse the available commercial data held on the central digital platform to generate insights and intelligence on market performance, enabling assessment of potential corruption risks		CO	2027

2.2 Public sector	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
Capability and knowledge (Outcome 2.2d)	2.2.20	Deliver an updated programme of corruption and fraud e-learning to all national and local public sector officials at risk to fraudulent or corrupt practice, and make it mandatory for all civil servants	Priority	JACU, GC FP	2026 - 2030
	2.2.21	Build awareness of the risks of fraud and corruption within national government by delivering an internal communications campaign for all civil servants		PSFA, GC FP	2026
	2.2.22	Build an effective culture to tackle corruption, bribery and fraud within the public sector through development of the Counter Fraud Leadership Development Programme, developing the Fraud Control Level 4 Apprenticeship and a separate fraud control qualification		PSFA, GC FP	2027
	2.2.23	Enhance public bodies' ability to manage fraud and corruption risks by increasing high-quality impact and risk assessments , developing risk assessment tools, and training more qualified fraud risk assessors		PSFA	2027

2.3 Business integrity	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
Prevention (Outcome 2.3a)	2.3.1	Launch a new anti-bribery resource collection on GOV.UK for UK businesses and other organisations with free resources to help them understand their exposure and implement measures which reduce bribery and corruption risks, and work with the private sector, academia and civil society to ensure this and other anti-corruption guidance remains in line with global best practice	Priority	JACU, FCDO, DBT	2026
	2.3.2	Expand the SFO's crime prevention capability to support companies in strengthening their protections against bribery and corruption	Priority	SFO	Ongoing
	2.3.3	The review into the UK's approach to responsible business conduct (RBC) will include bribery and corruption, alongside other harmful practices related to the environment, human and labour rights		DBT	Ongoing
	2.3.4	Based on the outcomes of the RBC review, assess further options for UK government to incentivise companies to put in place anti-bribery measures, including through access to public advantages		JACU	Ongoing
	2.3.5	Clarify and strengthen incentives for self-reporting by corporates through the implementation of the SFO's External Guidance on Corporate Co-operation and Enforcement		SFO	Ongoing

2.3 Business integrity	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
Overseas markets (Outcome 2.3b)	2.3.6	Develop a toolkit for the UK's diplomatic and trade network , drawing on public and private sector experience, equipping officials to provide guidance to businesses and engage with host countries on anti-corruption issues affecting British companies	Priority	JACU, DBT, FCDO	2026
	2.3.7	Continue, where appropriate, to seek robust anti-corruption provisions within our trade agreements . Provide for the monitoring and implementation of these provisions after agreements come into force	Priority	DBT, JACU	Ongoing
	2.3.8	UK Export Finance (UKEF) will partner with like-minded Export Credit Agencies (ECAs) to promote higher standards of financial crime due diligence for ECAs , including through participation at the OECD Export Credit Group financial crime expert practitioner meetings and other international fora such as the Berne Union		UKEF	Ongoing
	2.3.9	Review UKEF's public financial crime compliance notices and information to promote higher levels of awareness of UKEF's financial crime due diligence and requirements among customers, stakeholders and other interested parties, with the end goal of deterring financial crime		UKEF	Ongoing

2.3 Business integrity	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
Overseas markets (Outcome 2.3b)	2.3.10	Pilot a programme to strengthen foreign bribery laws and enforcement overseas to reduce unfair competition for British businesses when operating internationally		JACU	2026
	2.3.11	Improve the flow of intelligence about incidents of bribery and corruption from the UK's diplomatic and trade network to law enforcement bodies		JACU, DBT, FCDO, NCA	Ongoing

3.1 International partnerships	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
UK international partnerships (Outcome 3.1a)	3.1.1	Host a UK Countering Illicit Finance Summit that will convene a broad coalition of governments, multilateral organisations, civil society and the private sector to take action on the shared vulnerabilities that enable corruption and illicit finance to thrive	Priority	FCDO	2026
	3.1.2	Elevate corruption and illicit finance as a UK foreign and development policy priority by embedding these issues across UK engagement strategies in key countries, and using selective Heads of Mission to promote collaboration across posts on shared corruption and illicit finance risks	Priority	FCDO	Ongoing
	3.1.3	Expand our network of overseas-based illicit finance experts and develop new dynamic partnerships with global and emerging financial centres focused on shared risks and tackling new and emerging methodologies for moving corrupt funds and broader illicit finance	Priority	FCDO	Ongoing
	3.1.4	Scale up the UK's International Centre of Expertise on Illicit Finance to understand and develop politically and technically sound responses to international illicit finance and the threat it poses to UK security, plus development and growth internationally		FCDO	Ongoing

3.1 International partnerships	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
UK international partnerships (Outcome 3.1a)	3.1.5	The UK's Public Private Partnership (PPP) function within the NECC will continue to develop its engagement with international PPPs to further the sharing of threat information on economic crime, including corruption, and to continue to advance best practice in utilising partnerships to respond to the threat		NECC, FCDO	Ongoing
Reducing harm to development (Outcome 3.1b)	3.1.6	Work with Global South countries to build long-term capacity to tackle corruption and illicit finance risks . This will include work by HM Treasury's Technical Assistance Unit to support developing countries in implementing Financial Action Task Force (FATF) Standards, and enhanced UK government collaboration with international financial institutions and regional development banks	Priority	HMT, FCDO	Ongoing
	3.1.7	Full mobilisation of the Centre of Expertise for Public Finance , to support partner countries to build stronger public financial management systems, strengthen independent oversight over how public finances are spent and deepen fiscal accountability		FCDO	Ongoing
	3.1.8	Deliver policy and programmatic support to tackle corruption in sectors at high exposure to corruption risks, including infrastructure and extractive industries (including critical minerals)		FCDO	Ongoing

3.1 International partnerships	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
Reducing harm to development (Outcome 3.1b)	3.1.9	Reduce corruption risks in climate finance by supporting the implementation of anti-corruption measures through British Investment International, and the Private Infrastructure Development Group investees, and integrating the public financial management system strengthening support into the Taskforce for Access to Climate Finance		FCDO	Ongoing
	3.1.10	Continue to play a lead role in anti-corruption and defence internationally and in NATO by investing in the Building Integrity UK Programme		MOD	Ongoing
Civil society (Outcome 3.1c)	3.1.11	Provide funding to civil society and investigative journalists , focused on fostering collaboration between local reporters and wider international groups with the help of data innovation to expose high harm corruption and illicit finance risks	Priority	FCDO	Ongoing
	3.1.12	Deliver a series of strategic dialogues with civil society and investigative journalists to inform and strengthen HMG's international response to corruption and illicit finance		FCDO	Ongoing

3.1 International partnerships	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
Civil society (Outcome 3.1c)	3.1.13	Expand the work of the UK's Politics, Governance and Rights Centre of Expertise to help HMG and our partners better understand and respond to the threats from corruption to democratic institutions, and checks and balances		FCDO	Ongoing
	3.1.14	Continue to play a leading international role in championing media freedom, protecting human rights defenders and civic space. This will include playing a leading role in the Media Freedom Coalition, updating HMG's guidance on supporting human rights defenders, including journalists and those promoting the rule of law and integrating these priorities into HMG strategies		FCDO	Ongoing

3.2 International standards	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
Collective voice (Outcome 3.2a)	3.2.1	Support the role of the United Nations in tackling corruption through the effective implementation of the UNCAC, working with a range of partners to champion efforts to increase the transparency, accountability, and inclusivity of the Implementation Review Mechanism	Priority	JACU, FCDO	Ongoing
	3.2.2	Support efforts to widen and increase participation in standard setting bodies such as the OECD, GRECO and FATF		HMT, JACU, MoJ, FCDO	Ongoing
	3.2.3	Use the UK's position within non-regional bodies such as the G7, G20, and the Open Government Partnership to advocate for the protection and enforcement of global anti-corruption standards, and to share good practice and real-world experience between countries		FCDO, JACU, CO	Ongoing
	3.2.4	Recommit to defending and promoting the role of non-government stakeholders , including civil society, the business sector and academia in international debate and policy formation		FCDO, JACU	Ongoing

3.2 International standards	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
Standard setting (Outcome 3.2b)	3.2.5	Ensure full and consistent implementation of strengthened FATF accountability mechanisms for meeting the FATF standards, and support low- and middle-income countries to implement the FATF standards	Priority	HMT	Ongoing
	3.2.6	Support the OECD Working Group on Bribery to increase its membership whilst maintaining its effectiveness and credibility, and to strengthen anti-bribery mechanisms through active participation in the group's evaluations, technical, and country missions	Priority	JACU, SFO, NCA, FCDO	Ongoing
	3.2.7	Work with countries at UNCAC to promote key standards, build diverse coalitions, and share best practice with real-world impacts, including by upholding the principles set out in the UK-led joint statement on the Implementation Review Mechanism in 2023		JACU, FCDO	Ongoing
	3.2.8	Actively support the GRECO to enhance anti-corruption standards across Europe and beyond, supporting the evaluation round on local corruption, and increase its engagement beyond Europe and with civil society, publishing recommendations		MoJ	Ongoing
UK-led initiatives (Outcome 3.2c)	3.2.9	Design and deliver a rolling programme of up to three UK-led initiatives focused on specific international standards , developed with like-minded countries and civil society partners, and delivered through UK multilateral engagement and overseas programming		FCDO, JACU, MoJ	Ongoing

4.1 Evidence and implementation	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
Evidence (Outcome 4.1a)	4.1.1	Pilot a new Corruption Research and Evidence Hub (Hub) to improve system understanding of the corruption problem and our response	Priority	JACU	2026
	4.1.2	Focus research across the analytical system on an agreed set of priority evidence gaps which are reviewed at least annually, drawing on relevant evidence from analytical teams, academics, and civil society		Hub, FCDO, NECC	Ongoing
	4.1.3	Identify and map existing data that relates to identified evidence priorities through collaboration between the Hub and key partners		Hub, FCDO, NCA, SFO, CoLP, PSFA	2027
	4.1.4	Improve understanding of the impact of corruption on the UK through targeted research, including in-depth harm analysis of investigated corruption cases		Hub, NCA, CoLP, SFO	Ongoing
	4.1.5	Consolidate system insights into a unified product which informs implementation of this strategy, and track the corruption problem at both the strand and strategy level, through development and monitoring of key indicators		Hub, FCDO	Ongoing
	4.1.6	Understand the impacts of our response , with an initial measurement framework agreed with partners within six months of this strategy being published, and progress assessments independent from delivery teams, with targeted evaluation where appropriate		Hub, JACU, FCDO	2026 - 2030

4.1 Evidence and implementation	ID	Anti-Corruption Strategy commitment	Priority	Lead departments	Due date
Outcome					
Oversight and transparency (Outcome 4.1b)	4.1.7	Provide regular updates to external partners via the Champion-led External Engagement Group, including civil society, academia, private sector, and the APPG	Priority	JACU	Ongoing
	4.1.8	Publish an annual progress update on GOV.UK with a high-level summary of progress made against the commitments in this strategy and provide a written ministerial statement to Parliament	Priority	JACU	Ongoing
	4.1.9	Publish two in-depth progress assessments at end of year three (mid-point) and year five (end point) of this strategy, and their agreed terms of reference, on GOV.UK	Priority	JACU	2028, 2030
	4.1.10	Provide leadership across HMG to ensure successful delivery of the strategy commitments and ensure effective oversight by ministers on progress against the agreed outcomes, including through effective cross-system governance		JACU	Ongoing

Understanding ongoing vs specific date commitments

In the strategy, commitments are scheduled in two main ways: ongoing or by a specific date. Here's what each means:

Ongoing: These commitments are expected to occur every year throughout the five-year strategy period. They represent recurring actions – such as annual reviews, reports, or training – that will be delivered consistently, though the exact scope or intensity of activities may vary from year to year.

Specific date: These commitments are tied to a particular point in time, such as a specific month or year. They are typically one-off or time-bound actions, like launching a new initiative or completing a milestone.

Annex D: List of UK government partners

Home Office (HO)

The HO plays a fundamental role in the security and economic prosperity of the UK. It leads, with HM Treasury, broader work to tackle economic crime, domestically and internationally, working across government. The HO also leads the UK's domestic response to corruption and co-ordinates cross-government efforts through the **Joint Anti-Corruption Unit (JACU)**. JACU is responsible for ensuring the UK Anti-Corruption Strategy is implemented, supporting the Prime Minister's Anti-Corruption Champion, representing the UK at international anti-corruption fora, and ensuring delivery across departments and agencies. It strengthens the UK's evidence base on corruption, co-ordinates a strategic response to the corruption threats, and ensures cohesive action across law enforcement and government departments to uphold global standards and commitments.

Foreign, Commonwealth and Development Office (FCDO)

The FCDO delivers for the UK internationally, leading the government's diplomatic, development and consular work around the world. The FCDO plays a leading role in the delivery of the UK's efforts to combat corruption and illicit finance internationally. This work is delivered through a variety of means including the FCDO's overseas network of diplomats and technical experts, multilateral engagement, and FCDO-funded programmes and capabilities. The FCDO also leads on the UK's sanctions policy, including using the Global Anti-Corruption Sanctions regime to disrupt corrupt actors and their networks and working to ensure that the UK's global influence drives collective international action. The FCDO leads the UK's development efforts, including supporting partner countries to build accountable institutions and tackle corruption and illicit finance. Its work underpins efforts to safeguard development outcomes, uphold international norms, and reduce the global drivers of corruption that impact the UK.

HM Treasury (HMT)

HMT maintains control over public spending, sets the direction of the UK's economic policy and works to achieve strong and sustainable economic growth across every region and nation in the UK. Regarding corruption and broader economic crime, HMT with the HO co-leads the government's response to economic crime, working in partnership with law enforcement agencies and the private sector. HMT is specifically responsible for the UK's anti-money laundering and counter terrorist financing (AML/CTF) regulatory regime and overseeing the UK's AML/CTF supervision regime and the performance of the 25 AML/CTF supervisors. HMT is also responsible for UK representation at the Financial Action Task Force (FATF), the international standard setter for measures to combat money laundering and terrorist financing. The Office of Financial Sanctions Implementation within HMT ensures financial sanctions are properly understood, implemented and enforced.

List of UK government partners and acronyms

UK government departments/directorates

Name	Acronym
Attorney General's Office	AGO
Cabinet Office	CO
Crown Prosecution Service	CPS
Department for Business and Trade	DBT
Department for Culture, Media and Sport	DCMS
Department for Education	DfE
Department for Energy Security and Net Zero	DESNZ
Department for Transport	DfT
Foreign, Commonwealth and Development Office	FCDO
HM Revenue and Customs	HMRC
HM Treasury	HMT
Home Office	HO
Joint Anti-Corruption Unit (Home Office)	JACU
Ministry of Defence	MOD
Ministry of Housing, Communities and Local Government	MHCLG
Ministry of Justice	MoJ
Office for Professional Body Anti-Money Laundering Supervision	OPBAS
UK Competent Authority	UKCA
UK Export Finance	UKEF

UK law enforcement

Name	Acronym
Border Force (Home Office)	BF
City of London Police	CoLP
Domestic Corruption Unit (CoLP)	DCU
Immigration Enforcement (Home Office)	IE
National Crime Agency	NCA
National Economic Crime Centre (NCA)	NECC
National Police Chiefs' Council	NPCC
Regional Organised Crime Unit	ROCU
Serious Fraud Office	SFO

UK public bodies/agencies

Name	Acronym
College of Policing	CoP
Government Counter Fraud Profession	GCFP
HM Prison and Probation Service	HMPPS
Public Sector Fraud Authority	PSFA
UK Security Vetting	UKSV

Annex E: Economic crime response

