

# United Kingdom

## 2015 Country Summary

### Recommendations

The United Kingdom's GI ranking in Band A places it in the very low risk category for corruption in the defence and security sector. The highest risk areas are Procurement and Operations, both in Band B (low risk).

The December 2014 National Anti-Corruption Plan included a number of actions for Defence: a Fraud Defence Board has been established to identify and mitigate fraud and corruption, a comprehensive self-assessment of corruption risk has been conducted, and Transparency and Anti-Corruption doctrine for deployed operations is being updated. Overall, strong anti-corruption systems are in place in Defence Institutions, underpinned by effective independent oversight mechanisms, including Parliamentary scrutiny. There is open engagement with civil society, robust public debate over Defence policy and personnel and procurement systems exhibit high integrity. There are nonetheless some areas in which the UK might wish to consider further strengthening arrangements:

#### Operations

The UK armed forces have taken some steps to address the potentially critical threat that corruption poses to the success of military operations. Further improvements could be made, for example, by taking proactive steps to limit the potential for facilitation payments on deployed operations by introducing clear regulations governing the interpretation of S.13 Chapter 23 of the Bribery Act 2010 [1].

#### Defence procurement

The level of non-competitive contracts awarded by the UK MOD has exceeded 50% over recent years. The UK government does have various measure in place to mitigate the risk posed by the high proportion of single sourcing, most notably the Single Source Regulations Office, which serves as an independent statutory regulator of single source procurement regime in defence. Nonetheless a continuing focus on this risk is essential. The UK government might look for opportunities to increase the level of open competition or at what steps might be taken to mitigate further the risks posed by single source procurement.

Certainly, a continuing focus on training and empowering procurement staff, including requiring strong evidence of compliance programmes from contractors and their supply chains is important. Other options might include increasing the transparency of internal audits, ensuring robust sanctions are in place to deter corrupt activity by personnel and contractors alike, and ensuring that recent changes to whistle blowing arrangements are strongly publicised and embedded. The UK might also consider sharing best practice with

other partners where systems for managing high levels of single sourcing are in place, such as the Canadian Advanced Contract Award Notice process.

### Export controls

Overall export control policy is strong and the standard of scrutiny by the Parliamentary Committee on Arms Export Controls (CAEC) is robust, although the Committee only reviews exports which have already taken place. At the same time, the UK continues to export arms to countries where democracy is weak and corruption a major risk; it should continue to improve the scrutiny of bribery and corruption risks, particularly in connection with government to government arrangements.

## Scorecard

Political	Defence & Security Policy	Legislative Scrutiny	4
		Defence Committee	4
		Defence Policy Debated	4
		CSO Engagement	3
		International AC Instruments	4
		Public Debate	4
		AC Policy	3
		AC Institutions	3
		Public Trust	3
		Risk Assessments	3
		Defence budgets	Acquisition Planning
	Budget Transparency & Detail		4
	Budget Scrutiny		4
	Budget Publicly Available		4
	Defence Income		3
	Internal Audit		3
	External Audit		4
	Other Political Areas	Natural Resources	4
		Organised Crime Links	4
		Organised Crime Policing	2
		Intelligence Services Oversight	3
Intelligence Services Recruitment		3	
Export Controls		3	
Finance	Asset Disposals	Asset Disposal Controls	4
		Asset Disposal Scrutiny	4
	Secret Budgets	Percentage Secret Spending	2
		Legislative Access to Information	4
		Secret Program Auditing	3
		Off-budget Spending in Law	4
		Off-budget Spending in Practice	
	Links to Business	Information Classification	3
		Mil. Owned Businesses Exist	3

		Mil. Owned Business Scrutiny	4
		Unauthorised Private Enterprise	4
<b>Personnel</b>	<b>Leadership</b>	Public Commitment	2
		Measures for Corrupt Personnel	4
		Whistleblowing	2
		Special Attention to Sensitive Personnel	3
	<b>Payroll and Recruitment</b>	Numbers of Personnel Known	4
		Pay Rates Openly Published	4
		Well-established Payment System	4
		Objective Appointments	4
		Objective Promotions	4
	<b>Conscription</b>	Bribery to Avoid Compulsory Conscription	
		Bribery for Preferred Postings	
	<b>Salary Chain</b>	Ghost Soldiers	4
		Chains of Command and Payment	4
	<b>Values, Standards, Other</b>	Code of Conduct Coverage	4
		Code of Conduct Breaches Addressed	3
AC Training		4	
Prosecution Outcomes Transparent		4	
Facilitation Payments		2	
<b>Operations</b>	<b>Controls in the Field</b>	Military Doctrine	3
		Operational Training	2
		AC Monitoring	2
		Controls on Contracting	4
		Private Military Contractors	3
<b>Procurement</b>	<b>Government Policy</b>	Legislation	4
		Transparent Procurement Cycle	4
		Oversight Mechanisms	4
		Purchases Disclosed	4
		Standards Expected of Companies	2
	<b>Capability Gap</b>	Strategy Drives Requirements	4
		Requirements Quantified	4
	<b>Tendering</b>	Open Competition v. Single-Sourcing	2
		Tender Board Controls	3
		Anti-Collusion Controls	4
	<b>Contract Delivery / Support</b>	Procurement Staff Training	3
		Complaint Mechanisms for Firms	4
		Sanctions for Corruption	3
	<b>Offsets</b>	Due Diligence	
		Transparency	
		Competition Regulation	
	<b>Other</b>	Controls of Agents	3
Transparency of Financing Packages		2	
Subsidiaries / Sub-Contractors		2	
Political Influence		4	