



ACCOUNTABILITY REPORT 2021

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STATEMENT FROM THE CHIEF EXECUTIVE OFFICER ON COMMITMENT TO ACCOUNTABILITY AND MAJOR CHANGES

The year 2021 was a year of ups and downs for many of us. With the pandemic still disrupting life around the world, we learned new ways to act and interact with each other. Together with our chapters around the world we fought against corruption in these trying times but fighting against corruption also means looking within. We strive not to just hold others accountable, but also hold ourselves accountable to those we work with.

For Transparency International (TI) 2021 was a year of consolidation. It was the year that we held our first Movement Summit, which showed the strength of our network and the knowledge that it holds. It was also the year that money laundering revelations such as the Pandora Papers came out, which strengthened our calls to end the exploitation of secretive corporate structures. But most importantly, we provided a call for action regarding corruption during the COVID-19 pandemic. With the rapid passing of procurement and pandemic related restrictions, our advocacy secured critical anti-corruption measures in the IMF emergency COVID-19 loans, showing again the importance of our work especially in critical times.

With the start of 2021 also came the start of our new strategic cycle. Our 10-year strategy, *Holding Power to Account*, provides a roadmap to a fairer and more equitable 2030. Together with our chapters this strategy means, amongst other things, working for the world's promise through the Sustainable Development Goals to "leave no one behind"

In our strategy we made a commitment, to renew our structure and make them fit for purpose, and part of this commitment is the Accountability Report. We committed to mainstreaming the concept and the idea of the Accountability Report in the organisation, and we hope, that with this report, you will see that commitment as well. An organisation like ourselves is accountable not just to the governments and organisations we advocate with, but also to those we work with as well. This report is there to show that even within our organisation, we do not shy away from ensuring that power is always held to account.

Together with our movement, we will work to fight corruption, and together with our movement, we stand to work for a brighter future. While our strategy has only started, we hope that it has already reflected in the work that has been done so far, and we hope to continue being accountable to you all.



Daniel Eriksson

Chief Executive Officer, Transparency International

CLUSTER A: WHAT WE HAVE ACHIEVED

A. THE IMPACT WE ACHIEVE

1. What are your mission statement and your theory of change? Please provide a brief overview.

Our mission is to stop corruption and promote transparency, accountability, and integrity at all levels and across all sectors of society. Our vision is a world in which government, politics, business, civil society, and the daily lives of people are free of corruption.

[Holding Power to Account](#) – A Global Strategy Against Corruption 2021-2030 sets out how our diverse Movement aims to contribute to a world in which power is held to account, for the common good. The 10-year timeframe of the strategy is divided into three strategic cycles: 2021-2022, 2023-2026 and 2027-2030. The global strategy focuses on two imperatives. The first is the fundamental importance of citizens mobilising as the ultimate check on abuse of entrusted power. Second is the principle of entrusted power, which lies at the heart of public and business integrity. These imperatives unite our movement towards three interrelated long-term goals:

- Checks and Balances – advancing institutional checks and balances against concentration of power; and
- Enforcement – accelerating the enforcement of anti-corruption standards for accountability; and
- Social Oversight – activating strong, active vigilance and engagement to protect the common good.

At the heart of TI's strategy lie seven strategic objectives:

1. Protect the Public's Resources,
2. Stop Flows of Dirty Money,
3. Secure Integrity in Politics,
4. Drive Integrity in Business,
5. Pursue Enforcement and Justice,
6. Expand Civic Space for Accountability, and
7. Build Community Leadership against Corruption.

The Strategy also identifies six commitments on how make sure our work is more flexible, innovative, and adaptable: 1) Agile Timeframes, 2) Connected global and national strategies, 3) Effective coordination, advocacy and support, 4) Stronger partnerships and presence, 5) Core principles and methods (Inclusive and Intersectional, Climate and environment conscious, Evidence-based, Tech-savvy, Protective of our people, Ethical and accountable), and 6) Impact and learning.

While the Strategy gives direction to the work of the entire TI Movement, at the level of the TI Secretariat (TI-S) our work is guided by a TI-S Implementation Plans (see [TI- Implementation Plan 2021-2022](#)) which describe our contribution to the TI Strategy, programmatic goals, and commitments about our ways of working. The TI-S Implementation Plan acts as a bridge between the Strategy 2030 and TI-S Annual Plans. Implementation Plans follow the three cycles of TI's Global Strategy, i.e.: 2021-2022, 2023-2026 and 2027-2030. The plan describes the priorities and objectives for the current strategic cycle, and the TI-S Roadmap (can be shared upon request) specifies organisational indicators by which TI-S can measure its success.

In our [Impact Monitoring Approach](#) we describe our main areas of change and how the various components together create the pathways to achieve change.

Policy and institutional change: The ultimate aim is to ensure that intergovernmental institutions, governments, political parties and businesses have all the necessary mechanisms,

policies or laws in place to redress and prevent corruption, sanction corrupt behaviour, and promote good governance.

Behaviour change: The ultimate aim is that individuals, communities, civil society organisations and social movements act systemically to promote global good governance and prevent corruption.

The impact matrix describes the various components that together create the pathways to achieve change and the desired impact. However, context matters: in some cases raising awareness is a big achievement in itself, but in others it falls short of the impact that could be possible given the context. Additionally, the various components are interconnected and build on each other. This means that there can be different ways of achieving change that do not necessarily follow a straight and ordinal path.



Policy and Institutional Change

Theory of Change: Intergovernmental institutions, governments, political parties and businesses that are exposed to Transparency International anti-corruption messages, sensitised to the issues and made aware of possible solutions change their institutional processes and policies (including standards, laws, amendments) in order to be more transparent and accountable.

Behaviour Change

Theory of change: Individuals, communities, civil society organisations and social movements that are exposed to Transparency International’s anti-corruption messages, sensitised to the issues and made aware of possible solutions increasingly move from seeking redress for personal/community-based grievances, toward engaging systematically in preventing or addressing corruption nationally and globally.

2. What are your key strategic indicators for success and how do you involve your stakeholders in developing them?

Over the next two years 2021-2022 our work will be guided by our two-year [TI-S Implementation Plan](#) which outlines our contribution to realising the [TI Strategy 2030: Holding Power to Account](#). Drawing on experience, our new Strategy 2030 means we will change how we operate. We must continue to become more flexible, innovative and adaptable. Under Holding Power to Account we will pursue our strategic objectives by following six commitments.

The Implementation Plan is complemented by our TI-S Road Map 2021-2022, which describes the specific changes we aim at achieving by 2022 for 6 strategic objectives and the six commitments about how we work. The road map allows us to clarify the progression towards our long-term ambitions, and thus helps us focus on how to deliver the impact that we aim for. If needed, we will assess and adapt these goals and indicators based on learning around how we are progressing and new realities we face.

Some key outcome level indicators for our strategic objectives and commitments include:

Strategy Area	Indicators
SO1 Protect the public's resources	# Number and description of actions taken by people/ communities to expose corruption and/or mobilise against public sector bribery and abuse.
	# Number and description of actions taken by competent authorities to sanction bribery and abuse or close loopholes, based on input and corruption reports received by people / communities
SO2 Stop flows of dirty money	#Number and description of reforms made in global, regional and national standards related to financial secrecy based on TI's recommendation
	# Number and description of actions taken by relevant bodies (government authorities, professional associations) as result of the exposure of professional enablers/ gatekeepers.
SO3 Secure integrity in politics	# Number of countries where NCs and oversight bodies are taking actions to detect, expose and counter political integrity risks and breaches by Dec 2022
	# Number and description of actions taken by civil society actors or relevant agencies as result of the detection and exposure of political integrity breaches by Dec 2022
SO4 Integrity in Business	# of CEOs publicly taking overall responsibility on integrity matters following TI's Business Integrity Principles
SO5 Pursue enforcement and justice	# and description of actions by criminal justice, regulatory or other relevant authorities related to grand corruption cases TI works on
SO6 Expand civic space for accountability	Number of individual activists, whistleblowers and journalists effectively protected following TI intervention
	Number of countries and/or regional and global fora with change in standards, policies and/or legislation to protect and enable whistleblowers, activists and/or journalists based on TI's recommendations.
Commitment 2 Connected global	# and relevance of national, regional and global outcomes contributing to the movement strategic objectives

and national strategies	
Commitment 3 Effective coordination, advocacy and support	Satisfaction of movement stakeholders with communication and collaboration
Commitment 4 Stronger partnerships and presence	# and description of strategic locations with improved and stronger presence
Commitment 5a Inclusive and Intersectional	% of TI-S staff who see TI-S as an inclusive organisation
Commitment 5e Protective of our People	# and description of chapters reporting that their capacity to manage risks has improved following TI-S direct or facilitated support
Commitment 6 Impact and Learning	Increased awareness on what works in TI-S and the Movement

The strategic planning process for the TI-S Implementation Plan 2021-2022 including the Roadmap was a participatory process led by the policy leads for each strategic objective and commitment yet engaging the people that are responsible for and contribute to implementing the work. We held community discussions and organised a consultation process that allowed everybody in TI-S to review the document and share comments/questions.

Overall, the Implementation Plan remains high-level and is complemented by annual plans and budgets that are operational in focus. Our annual planning and bi-annual reporting system allows us to assess the progress made against our annual Implementation Plans and to inform learning and accountability reports. The findings are used to inform strategic decisions and improve programme design and implementation, improve allocation of resources by diverting funding from ineffective to effective interventions and ultimately to build knowledge on what works and what does not work in the fight against corruption.

Multi-country projects, programmes and initiatives coordinated by the TI Secretariat design fit-for-purpose monitoring systems that are aligned with the larger goals of the organisation. Regular field visits (post COVID), regional meetings, monitoring reports and working groups promote learning between TI-S and the TI Movement. The project and programme data is linked to and fed into the organisational monitoring system.

Further, we have developed and adopted our [own approach to monitoring impact for anti-corruption work](#). This approach is designed to help us gain a better understanding of what works in the fight against corruption, why and how it works. It is a twin-track approach that consists of a) the impact matrix: an analytical lens to be used in projects and initiatives to monitor their progress in achieving change; and b) in-depth impact assessments that zoom in on relevant correlations identified through the monitoring. The guide provides a list of sample indicators that can be adopted by programmes, projects and national chapters.

3. What progress has been achieved and difficulties encountered against these indicators over the reporting period?

Transparency International's 113 independent chapters and contacts around the world create and implement their own national strategies, but also join forces on critical issues to form the leading movement in the fight against corruption. The TI-S Annual Report 2021 showcases the work of the TI Secretariat in 2021, which coordinates the broader movement worldwide, spearheads global and joint advocacy, gathers best practices, conducts world-class research, and provides financial and technical support to our chapters.

2021 Achievements in a Nutshell

2021 was another remarkable year for Transparency International movement. We launched our 10-year strategy "Holding Power to Account". Developed in close collaboration with our diverse global movement, it is guiding Transparency International's connected and collective ambition for 2030. In January, we leveraged the CPI 2020 to call for action on corruption amid the ongoing health and economic crisis. With growing COVID-19 corruption risks across public procurement and basic services delivery, our advocacy secured critical anti-corruption measures in the IMF emergency COVID-19 loans framework.

Later in the year, revelations in the Pandora Papers and Open Lux investigations strengthened our global calls for beneficial ownership transparency, while the explosive revelations of the Pegasus Project raised acute concerns for activists and journalists around the world, including our own people. Alongside political developments in Myanmar and elsewhere, Pegasus was a harsh reminder that as civic space shrinks in the face of authoritarianism and populism, we must not lose focus on the big picture: fighting corruption is a human rights issue and anti-corruption activists require protection. This was also recognised by the UN Special Rapporteur on Human Rights Defenders. As the year came to a close, we marked International Anti-Corruption Day by calling on governments joining the Summit for Democracy to deliver on their anti-corruption promises. Our work resulted in many achievements that help us advance on our strategy objectives, which are described in greater detail in the [TI-S Annual Report 2021](#). The key outcomes below highlight some of our global impact over the past year:

Protect the Public's Resources

- We exposed how corruption is crippling lifesaving COVID-19 responses. The launch of our flagship Corruption Perceptions Index kick-started a global conversation on corruption and health care. We followed up by calling for transparent vaccine contracts, and secured critical anti-corruption measures in emergency pandemic loans.
- Our anti-corruption recommendations were adopted by the Central African Forest Initiative, responsible for one of the world's largest carbon sinks in the Congo Basin.

Stop the Flows of Dirty Money

- We edged closer to ending secretive corporate structures, everywhere. Following our persistent campaigning against the abuse of anonymous companies – a favourite vehicle for laundering stolen funds – registers of true company ownership are now set to become a worldwide requirement.
- Following years of advocacy, governments in Chile and Canada have finally put up the money to make company ownership information transparent, closing a door on dirty money.

Secure Integrity in Politics

- Alongside our national chapters, we pushed for political integrity reforms at both the national and international level. At the Summit for Democracy, we worked with our US office to formulate national pledge recommendations to protect politics from the influence of dirty money from abroad.
- Our Global Corruption Barometer recorded for the first time experiences of corruption among ordinary people in the Pacific - and the results made officials pay attention.

Drive Integrity in Business

- Our interventions with business leaders at B20 'Integrity & Compliance' Task Force meetings throughout the year helped make the case for better anti-corruption safeguards.
- The first-ever US' Strategy for Countering Corruption reflects many of our recommendations for effective and lasting action, including a call to extend anti-bribery laws to those who demand bribes. Our US Office is leading the bipartisan effort to pass this landmark expansion of the law.

Pursue Enforcement and Justice

- We took the fight against corruption to the global stage, with two major firsts. In June, the first-ever United Nations General Assembly Special Session against Corruption heeded our calls and drew up several significant international commitments. In December, in a move that echoed our recommendations, the first Summit for Democracy produced pledges to address forms of cross-border corruption that are undermining democracy.
- We helped our partner in Gambia to successfully challenge the National Assembly for awarding its own members 54.5 million Dalasi (over one million US Dollars) in public funds for their personal use.
- The European Commission advanced legal action against Cyprus and Malta over their golden passport schemes – which we and our partners had exposed as a back-door for corruption – reaffirming the intention to ban all such schemes in the EU.

Expand Civic Space for Accountability

- We made protecting anti-corruption activists a human rights priority. Our ongoing efforts contributed to the UN Special Rapporteur on Human Rights Defenders acknowledging the risks taken by – and the bravery of – those who hold power to account by calling out corrupt acts.
- We expanded the world's largest survey on the impact of corruption in daily life. Our 2021 Global Corruption Barometer in the EU and the Pacific surveyed thousands of people in more than 35 countries, providing the only comparable data on favouritism in the public service and sexual extortion. Other disturbing patterns of exploitation were exposed in our ground-breaking report on corruption and discrimination in July.

Over the last year, more than 67,000 media articles referred to findings and recommendations from our movement, expanding the anti-corruption conversation to new audiences. We surveyed more than 46,000 people for our Global Corruption Barometer in the EU and Pacific. Our Advocacy and Legal Advice Centres in 62 countries provided free, confidential advice to victims and witnesses of corruption. We submitted 34 corruption-related legal submissions made by our chapters in 17 countries, to hold the corrupt accountable.

As the COVID-19 pandemic continued to disrupt and reshape global affairs, we adapted to new ways of working and persisted in our mission fighting corruption from the grassroots to global level. In 2021 we took steps to align our operations with our new strategy with facilitate a closer focus on advocacy. We finalised updates to our integrity system and successfully delivered the first-ever TI Movement Summit. The TI Movement Summit was an opportunity for all participants to celebrate and leverage TI's main strength in the fight against corruption: our national chapters. Over 250 TI anti-corruption fighters from around the world took part in the virtual event to exchange lessons learned, ask questions, and spark new ideas.

Monitoring progress made

TI Secretariat's monitoring, evaluation and learning system allows assessments on the progress made against the TI-S Roadmap 2021-2022 and informs learning and accountability reports. Each strategic objective and commitment have an appointed policy lead who is responsible for tracking their overall progress and to reflect on achievements, main challenges and recommendations for future. A more systematic review on the progress against the Roadmap indicators will be conducted later in 2022 at the end of the first strategic cycle. 2021 was the first year of

implementing our new Strategy 2030. Some challenges identified during the annual reporting process for 2021 included:

- Limited human resources and huge workload
- It is hard to influence high-level negotiations that take place behind closed doors
- Restrictions related to the COVID-19 pandemic that affect attending events and advocating

4. Have there been significant events or changes in your organisation or your sector over the reporting period of relevance to governance and accountability?

Due to the Covid19 pandemic, Annual Membership Meetings were organised virtually. That led both to an increase of digital communication tools but also to innovation on how to exchange within the TI Movement about TI's progress against the 2030 Strategy.

In 2021, the first TI Movement Summit was organised. The Movement Summit is an internal multi-day event in which the the entire TI Movement comes together and discusses progress in their anti-corruption work. Those discussions were previously held at the Annual Membership Meeting but were then mixed with governance and legal topics. The Movement Summit allows for a more focused, inclusive and strategic discussion about anti-corruption.

The International Council (IC), established in 2019, is TI's expert body. Lots of efforts have been put into setting the council up and providing it with resources. Processes for appointing new IC members and for liaising between the TI Movement and IC have been set up.

The first member of the IC was appointed as independent board members of TI. Up to two independent board members can be appointed by the Board of Directors.

B. POSITIVE RESULTS ARE SUSTAINED

1. What have you done to ensure sustainability of your work beyond the project cycle, as per commitment 4? Is there evidence of success?

When implementing projects and programs, those are usually through local organisations who make sure to include stakeholders – it is almost always an element to raise their capacities.

Our learning products (research reports, materials, trainings, etc.) are free and available through our websites and other platforms. For example, the Global Corruption Barometer conducted in the Pacific for the first time in 2021, will have an impact throughout the life cycle of the project it was funded by. New information generated about people's lived experience of corruption and their views in the region will remain as evidence for people to push for further changes over many years, and is already being used by other organisations and initiatives such as the Pacific Group of Parliamentarians against Corruption.

Our interventions are designed in a way to last beyond project durations: for example, through policy changes, reforms, etc: for example, our advocacy to improve access to information legislation, or whistleblower protection mechanisms, will affect people's ability to demand accountability well beyond the specific project cycles.

Many of our actions aim at equipping stakeholders (including communities) so that they know better their rights and have tools available that allows them to play an active role in demanding accountability. Through several projects we support social accountability mechanisms that empower people first with information about their rights, and then with skills and support to claim these – for example, we support chapters to organise community workshops on right to information laws, and then support them to file complaints; these communities are then better equipped to continue to do so beyond the project timeframes.

Innovation and learning are important to TI. Besides the ongoing monitoring of our work, TI regularly conducts learning reviews and independent evaluations to assess the effectiveness of our projects and programmes, and to improve our learning and internal accountability processes. We aim at sharing learnings and knowledge in the organisation, so that they are available to colleagues beyond specific project teams.

2. What lessons have been learned in this period? How have the lessons been transparently shared among internal and external stakeholders? How do you plan to use these lessons to improve your work in the future?

External evaluations of TI's work provide valuable insights into our operations – what we do well, what we can improve upon. They are also an important accountability measure, based on rigorous third-party examination of our activities. Most of these evaluation reports are shared on our [website](#).

At the moment we don't compile (yet) lessons learned from the various evaluation reports in one document, however, we ensure that knowledge sharing events are held that allow colleagues to learn and ask questions. The lessons learnt from the independent reviews feed into the development of concepts and proposals for the next phase of work. Beyond that it's the responsibility of project teams and national chapters to discuss learnings with involved stakeholders and share them in different channels.

Some recommendations from the evaluations conducted during the reporting period of 2021 include:

- TI-S could play a role in facilitating the exchange of expertise. Expertise in Chapters could be further built for future work by assessing staff skills and knowledge before programme launch; providing training on budget transparency to all TI staff; and providing context

analysis (e.g. through disseminating the reports which have been prepared under the funding).

- TI-S and the donor(s) should see to it that programmes are created in a more 'bottom-up' fashion. They should invest in participatory Theory of Change development, as well as analyses of local political economies to inform ambitious but realistic proposals. The intervention logic should be captured in an accessible narrative form and made widely available.
- TI-S and the donor(s) should ensure that design of the results framework and its indicators should also be an inclusive, participative and reviewable process, informed by the best available expert advice. TI's high-level indices of perceptions of corruption (such as the Corruption Perceptions Index and the Global Corruption Barometer) are unlikely to be appropriate as measures of the ultimate impact of anti-corruption Programmes of this kind.

C. WE LEAD BY EXAMPLE

1. How does your organisation demonstrate excellence on your strategic priorities?

The strategic priorities are based on previous experience, research and consultations with the TI Movement. Each of the strategic objectives are led by experts, who are well recognized in their fields of work. They are called upon by international organisations, UN agencies and institutions, governments and civil society organisations to provide expert advice and inputs. The policy positions and recommendations of TI are backed by robust research conducted by the Knowledge and Research team at the TI-S as well as by national chapters, which have also established excellence in certain areas of work. The inputs provided by TI to the Financial Action Task Force (FATF) have been widely welcomed by the members of FATF. Similarly, TI has been able to make valuable contributions to the UN Conventions on Anti-Corruption.

2. What evidence is there that your expertise is recognised and welcomed by your peers, partners and other stakeholders?

In 2021, we secured 996 unique A-grade media mentions worldwide and 2.7 million visitors to the website. We also built newsletter subscribers to 56,606 and social media followers to approximately 922k. In terms of social media, that is broken down in the following way

- Twitter: 255,900
- LinkedIn: 82,700
- Facebook: 560,900
- Instagram: 23,000

Transparency International continues to attract important media attention with our flagship tools (Corruption Perceptions Index (CPI), and the Global Corruption Barometer (GCB)) and other research products. There were 67,000 + media articles referring to findings and recommendations from our movement, expanding the anti-corruption conversation to new audiences. In the week following the CPI launch, more than 6,300 media articles picked up the corruption debate. In academic publications alone, despite a sharp decline in the number of academic and policy articles being written on corruption every year since 2016, the number of mentions of the CPI in such articles remains stable at more than 3000 mentions per year. We also continue to meet the knowledge and research needs of bilateral development agencies and the TI movement through our Helpdesk services, an on-demand research service on corruption. The annual feedback survey indicates high level of satisfaction of Helpdesk users with the service. Ratings of responses were stated as Excellent or Very good (Quality of research: 61% Excellent; Ease of understanding: 65% Excellent; Timeliness of response: 52% Excellent; Relevance to my question: 70% Excellent; Usefulness for my work: 65% Excellent). 96% respondents would recommend the Helpdesk service to others.

3. How does your organisation practice being inclusive and protecting human rights, including promoting women's rights and gender equality, in accordance with commitments 1-2?

Transparency International is committed to the protection of human rights, to uphold diversity and to apply standards equally. The commitment goes beyond what is already demanded from statutory rules. Inclusiveness, protection of human rights as well as promotion of women's rights and gender equality are reflected in our [Umbrella Statement](#) as well as in the TI-S [Code of Conduct](#), the [TI-S Integrity Violations Reporting Policy](#), and further policies such as the TI-S [PSEAH](#).

In its project work TI has identified several vulnerable groups such as women and their link to corruption and land. Diversity is one of the areas the Board is focussing on and this is being formalized through developing a competency-diversity-matrix for both, the Board of Directors, and

the International Council, see also J1. The Board of Directors is evaluating the diversity of its composition on an annual basis.

TI-S aspires to secure equal opportunities, fair and equal treatment for every single person who works at TI-S, regardless of age, gender, race, ethnicity, physical ability, religion, belief, sexual orientation, or other aspects of one's identity. TI-S employees stem from 45+ countries and a taskforce on gender is contributing to policy development. To support the mainstreaming of gender and diversity principles into the organisation's policies/processes and procedures and to complement key aspects of the TI-S Code of Conduct, TI-S has created a Gender & Diversity Policy. In addition, TI-S seeks regular feedback from staff, including questions related to inclusiveness, through its regular staff surveys. The staff survey conducted in 2021 shows that 71 % of staff perceive TIS to be an inclusive organisation. These results indicate a major improvement compared to staff perceptions collected in previous surveys on similar questions. As part of the TI-S integrity system, TI-S has a fulltime *Integrity Manager*.

TI is committed to the protection of human and women rights in its programmatic work. Our 2018 AMM resolution for example commits the movement to advocate for the recognition of sextortion as a form of corruption, the collection and publication of gender disaggregated data on the impact of corruption on women and men and recognises the need to mainstream a gender perspective in anti-corruption programmes and policies. Our new strategy 2030 goes a step further by committing the organisation to be inclusive and intersectional in everything that we do, and ensure that our planning and actions will address differences of gender, sexual orientation, race, ethnicity, religion, economic status, etc.

To support targeted advocacy efforts, we focused on generating evidence on the linkages between gender, marginalisation and corruption, including with the publication of a ground breaking study on [the linkages between corruption and discrimination](#) or the collection of quantitative data on sextortion through our GCB. We have established strategic partnerships with regional and international organisations engaged in advancing women's rights such as UN Women Latin America, the International Association of Women Judges, the Equal Right Trust and reached out to other potential partners in view of establishing strategic partnerships (CIPE, CEDAW, UNODC, IWRA-AP, UNWomen Bangkok, Global Fund for Women, OHCHR. We have also targeted regional and global bodies, including EC, G20, IMF, UNCAC and Open Government Partnership (OGP) to more regional bodies such as APEC, ASEAN and the African Union with our advocacy efforts and call to mainstream anti-corruption in their actions promoting gender equity and women's empowerment, to adopt a gender inclusive and gender sensitive approach to fighting corruption; to recognise gendered forms of corruption, particularly sextortion; to mainstream gender considerations and to collect disaggregated data on gendered forms of corruption and their impact on women.

As part of our mainstreaming efforts, we are also increasingly and more systematically assessing the impact of corruption on women and men in our global programmes, with the generation and analysis of gender disaggregated data and the compilation of reports, papers and studies on gender and corruption. As part of our Global Corruption Barometer, we conducted a gender analysis of GCB findings in Africa, Latin America and MENA.

4. How do you minimise your organisation's negative impacts on your stakeholders, especially partners and the people you work for? How does your organisation protect those most susceptible to harassment, abuse, exploitation, or any other type of unacceptable conduct?

How do you minimise your organisation's negative impacts on your stakeholders, especially partners and the people you work for?

We manage safety risks during our activities:

- We assess risks for ourselves and partners when designing projects (a risk analysis is included in fundraising proposals)
- We have specific risk assessments for higher risk activities, eg legal submissions, case-based advocacy.

We have a dedicated function (SAFE) to support our staff, chapters, and partners:

SAFE, led by TI-S Global Security Manager, is the primary focal point for security in TI-S. SAFE is responsible for developing, implementing and monitoring security policies and documentation and leading crisis management efforts; supporting TI national chapters in building capacity to manage security risks; coordinating TI-S response to chapter-related security incidents; and developing protocols and resources to support chapters' security risk management.

The Rapid Response Unit (RRU) is a cross-team group of TI-S staff responsible for fast-emerging and imminent threats to Transparency International, its people and its mission. The RRU is comprised of staff from Communications, SAFE, Technology, Global Movement, and Governance & Legal. It also draws on additional expertise from other teams as needed. The RRU deals with situations and incidents such as:

1. Threats to safety, security, freedom or rights of individuals or entities in TI movement;
2. Threats to the reputation of the TI movement or its component parts;
3. Threats to the safety, security, freedom or rights of TI's partners and allies;
4. Threats to anti-corruption, civil society space and the rule of law.

How does your organisation protect those most susceptible to harassment, abuse, exploitation, or any other type of unacceptable conduct?

TI-S staff conduct:

TI-S Integrity System and HR policies are the main instruments to safeguard against potential misconduct perpetrated by our own staff in this area. Our Code of Conduct explicitly covers discrimination, harassment and bullying, sexual harassment, exploitation and abuse and child abuse (see section 6). Safe channels are published on our website and are available for staff, chapters, and other 3rd parties to report misconduct. We also have specific policies owned by our HR department about the prevention of sexual harassment and exploitation (PSEAH) and Child protection.

Links to supporting documents:

- [TI S Code of Conduct](#)
- [TI S Integrity violation reporting policy](#)
- [TI S PSEAH policy](#)
- [Anti-Harassment policy for TI organised events](#)
- [TI S Child protection policy](#)

Our Chapters conduct:

Our accreditation criteria requires that Chapters have measures in place. This is evaluated through our Self-Assessment Form (SEF), the basis for the accreditation reviews which look at:

- Presence and effective implementation of an anti-harassment and safeguarding policy
- Procedures and publicly available channels in place to effectively handle ethical complaints against the chapter, its representatives, management or staff
- Policies in place to prevent conflicts of interest or reputational issues in the various aspects of the chapter's activities (donations, procurement, paid services, advocacy on individual cases, etc.)
- Number of complaints received against the chapter or persons affiliated to it, number of pending cases, number of solved cases, nature of complaints

The Board Ethics Committee does – if approached – follow up on complaints and cases if within the scope of the Committee. The TORs of the Board Ethics Committee can be found [here](#) (PDF).

5. How do you demonstrate responsible stewardship for the environment?

Climate and environment consciousness is laid down as a core principle and methods in our TI Strategy 2030. As such it is part of our Making-it-happen commitments which – together with our strategic objectives – receive highest priority in TI-S' work.

In 2010, the TI-S Green Task Force - TIGRE had been set up at TI-S as a voluntary task force responsible for TI's environmental reporting.

TIGRE aims at integrating environmental concerns into all decision making, promoting environmental awareness among staff, and reducing waste and pollution, seeking to continually improve our environmental performance. As one of the biggest concerns is air travel, the taskforce measures our CO₂ emissions and sets reduction goals of 5% a year. Through the new Sustainable Travel Policy (Annex 2) and the introduction of new flight limitations and protocols, staff is made more aware of our environmental impact.

TI-S has made efforts to reduce the carbon footprint of its office activities in Berlin. Initiatives include:

- a functioning waste recycling system
- a pure nature tariff energy supply
- movement sensor light systems, neon light tubes being replaced with LED energy saving tubes on a rolling basis
- appliances being selected taking into consideration low energy consumption and professional recycling of old appliance
- maintenance of white ware and replacement options
- modified printing system to reduce paper consumption, selection of paper is met by several factors such as environmentally friendly and decent sources
- office and cleaning material is selected by favouring vendors with green products
- energy saving mode at coffee machines, microwaves, and air conditioners.

TI-S has started working with *Planety* to work on an environment report regarding TI-S' environmental impact including CO₂-footprint calculations. The report for 2021 was not finalized at the time of this draft report. The 2020 report found that TI-S CO₂ footprint was at 969,62 tCO₂e of which

- 608.97 tCO₂e was purchase of goods and service
- 219.04 tCO₂e was business travel
- 42.39 tCO₂e was employee commuting
- 35.82 tCO₂e was capital goods
- 24.49 tCO₂e was use of sold products
- 11.21 tCO₂e was upstream leased assets
- 4.84 tCO₂e was fuel- & energy-related activities
- 0.18 tCO₂e was waste generated in operations

CLUSTER B: OUR APPROACH TO CHANGE

D. KEY STAKEHOLDERS ARE IDENTIFIED WITH GREAT CARE

1. Please list your key stakeholders. What process do you use to identify them?

At the moment, TI-S does not have a systematic way of identifying stakeholders, but rather each project has its own detailed analysis and process to do so. From a very high-level point of view these are the main external stakeholders: institutional donors, private corporate donors, private individual donors, press, corrupt individuals and corporates, CPI and other tools users, prosecutors and other institutions investigating corruption, pro bono networks, peer-NGOs, research institutes, investigative journalists.

Fundraising carries out prospecting for new grants and donors using available online platforms from the EC, US, as well as keeping regular subscriptions to DEVEX. Fundraising also records all relationships with donors in Salesforce.

A list of TI's affiliation and institutional stakeholders can be found [on our website](#).

2. How do you ensure you reach out to those who are impacted or concerned by your work?

We do not have one standardised process for involvement of affected stakeholder groups, and every project and programme is different. However, participatory, and accountable project design, implementation, monitoring and evaluation practices are highly encouraged.

The ALACs are our most relevant people engagement mechanism and provide people affected by corruption the opportunity to inform the focus of our work. The ALACs can be contacted through diverse channels. Some TI National Chapters organise mobile ALACs to reach out to people in communities.

One of our regular research products, the Global Corruption Barometer, is a representative public opinion survey on corruption conducted in more than 100 countries worldwide.

We promote the involvement of both internal and external stakeholders and constituents as part of trainings on our Impact Monitoring Approach (IMA). The approach is highly participatory. For example, M&E findings are required to be validated by external stakeholders. Further, we suggest collecting evidence for our impact claims by seeking stakeholders' views, for example by organising semi-structured interviews with project partners and targeted stakeholders, focus group discussions with beneficiaries or other stakeholders and feedback surveys.

Besides the ongoing monitoring of our work, TI regularly conducts learning reviews and independent evaluations to assess the effectiveness of our projects and programmes, and to improve our learning and internal accountability processes. It is standard to engage and interview external stakeholders as part of these evaluations. The exact groups to be interviewed are decided on by the independent external evaluators.

3. How, specifically, do you maximise coordination with others operating in the same sectoral and geographic space with special reference to national and local actors?

A stakeholder analysis is included from the first stage of considering projects through the process under the Resource Mobilization Group (RMG). At the next step, stakeholder analysis is also used in most project proposals developed by TI S.

Most TI Chapters work in partnership with networks of community-based organisations for project implementation. The Chapters also work in tandem with other NGOs working at national level on common or overlapping issues such as human rights, environmental defense youth outreach, inclusivity and civic space protection.

In addition to the Chapter structure TI-S works in partnership with organisations and networks in countries where there are no TI Chapters. These partnerships include joint project implementation or advocacy campaigns on common thematic areas of work. Those partners are MANS in Montenegro and the Bathory Foundation in Poland.

E. WE LISTEN TO, INVOLVE AND EMPOWER STAKEHOLDERS

1. What avenues do you provide your stakeholders to provide feedback to you? What evidence demonstrates that key stakeholder groups acknowledge your organisation is good at listening and acting upon what you heard?

Engagement in the strategy-related processes:

Vision 2030 process (2019)

The first step towards TI's new strategy was the Vision 2030 process, providing a rich and challenging picture of how the world and the fight against corruption are likely to look in 2030, based on the perspectives of TI's internal and external stakeholders, and a landscape analysis of existing research and knowledge on trends.

How internal and external stakeholder have been involved in the process:

- Direct stakeholder input: engagement of over 45 internal and external stakeholders through interviews, workshops and webinars, three international Board workshops, and consultation of 100+ TI Movement members in five regional meetings.
- Vision 2030 Survey: Over 500 responses from internal and external stakeholders
- Final report: Vision 2030 – Findings Report

The AMM 2019 in Berlin marked the transition to the strategy development process. The goal of the TI Strategy process was to develop TI's next Movement-wide strategy for the global fight against corruption in the coming years by (1) identifying TI's shared goals and (2) setting out how TI plans to contribute to these goals at global, regional and national levels.

How internal and external stakeholders have been involved in the strategy development process

The strategy development process was highly participatory. Stakeholder have been consistently informed, and directly involved in key stages of the process - from consultation, validation to final endorsement, incl.

- Movement leadership: To ensure a stakeholder-driven strategy, the development process was led by a Movement Strategy Task Force, a group of representatives from 12 TI members, chaired by a Board member, and supported by teams across the TI Secretariat.
- Direct stakeholder input: engagement of over 180 internal and external stakeholders in over 30 hours of (virtual) sessions, incl. interviews, workshops, region-focused exchanges, global briefings, Q&A sessions etc.
- Strategy survey: Over 200 survey responses from internal and external stakeholders to identify the strategic ambition and focus
- Validation: Over 50 responses from TI Movement members to improve the final draft strategy
- Movement endorsement: The TI Strategy 2030 was approved by the Board of Directors, and endorsed by TI members at the AMM 2020.

Strategy Implementation

See E3 for structures and processes implemented to engage with internal and external stakeholders for an aligned implementation of the strategy

Staff Survey – Going forward

In 2022 it is planned to continue working on further improvements in the areas commitment made in 2020, in particular:

- Continued building of confidence in leadership;
- Improved use of internal communication particularly around change initiatives;
- Improved cross-team collaboration;
- Improved employee engagement, commitment and retention (related to performance and objective setting).
- Fully functional and trusted Integrity System.

2. What evidence confirms a high level of stakeholder engagement in your activities and decisions from beginning to end?

HR involves people in many different ways in relation to TI-S issues including Ask-Me-Anythings (AMAs), multiple surveys (work arrangement survey, engagement survey, also we work very closely with the WoCo which is the elected body of the employees, etc.).

For internal processes, the organisation is consulting with its members on all issues which are relevant to the whole Movement such as the TI Strategy 2030 or any Governance Changes. In terms of joint advocacy, fundraising and communication, this is based on Donations Policies as well as the Ethical Advocacy Policy. However, the main coordination work is done via undocumented processes between key internal stakeholders such as TI members, offices and subsidiaries.

Stakeholder engagement is a core aspect of proposal development and project/programme implementation. TI-S regularly consults with chapters, donors and other partners to exchange ideas, findings and learnings across all our work. This does not take one form of activity. For example, we provide Q&A sessions for donors on specific organisational and programmatic topics, as well as regular 1-1 check-ins. At project level, stakeholder analysis is part of most proposals from the beginning. Initial consultations are held with chapters to develop proposal concepts and planning through workshops, questionnaires, and other tools of engagement. Depending on the project, internal and external stakeholders have been included in proposal development, during project implementation through project meetings, and in mid-term or end of evaluations. In-country projects are developed with local partners (not restricted to chapters but also other CSOs, local networks, the academic community, etc.) to ensure proposed interventions are relevant, feasible and do no harm to local communities.

One good project illustration is the Land and Corruption Project in Africa (Phase II) which has been set up to monitor progress and gain in-depth feedback from stakeholders by identifying 'sentinel communities' (two in each of eight countries of implementation) to engage with throughout the project lifecycle. These will serve as 'barometers' to gain insights on issues that affect the communities and the way the project responds to these issues.

3. What are the main likes/dislikes you have received from key stakeholders? How, specifically, have you reacted to their feedback?

Regular meetings between management/Human Resources and the Works Council take place. Open comments are possible and welcome in the Staff Survey and have been evaluated.

Feedback we received throughout the strategy development process for a better strategy implementation

- We heard: Better Movement coordination and mobilisation needed to fully tap into the strength of Movement
 - We reacted: participatory planning process for each strategic cycle Purpose: identification of focus areas for Movement to ensure mobilisation of resources and collective action from local to global level.
- We heard: Make sure TI Strategy is a reference point for the whole Mvmt, not TI-S only
 - We reacted: establishment Strategy Reference Group; Role = inform/advice National Chapters and TI-S in the implementation of the strategy; specific role: steer the planning process for strategic cycles;
 - Strategy implementation monitoring: development of Strategy MEL framework (ongoing, roll-out 2nd half of 2022) and conducting of baseline (2021)
- We heard: Provide more space for Movement exchange, learning and coordination (beyond regional exchanges)
 - We reacted: set-up and strengthening of thematic communities of practice around Objectives of the TI Strategy (incl. dedicated yammer groups and strategic objective-focused planning sessions). These communities are open for TI internal and selected external stakeholders.

- creation of the Strategy Hub = go-to place for strategy related information and resources to support alignment and coordinated implementation of the strategy across the Movement
- Establishment of Movement Summit: once-a-year (virtual) summit that brings together the Movement (incl. external partners, experts, peers etc.) to showcase strategy implementation progress, connect people and plan together for joint action.

At project level, mid-term reviews and evaluations typically ask for feedback from key stakeholders according to evaluation criteria, TI produces a management response and responds to the recommendations made by adjusting the work for the remainder of the project cycle, or by including this learning in the development of new phases of work.

4. How do you know that people and partners you worked with have gained capacities, means, self-esteem or institutional strengths that last beyond your immediate intervention?

The accreditation process gives an indication as to how National Chapters improve their organisational capacities. In addition, we regularly conduct training evaluations at the end of capacity building activities. For example, with regards to MEL trainings we occasionally follow up months or years later to see how the learning is being implemented by training participants.

At TI-S we engage in ongoing independent assessments of our programme work in the form of third-party evaluations and reviews. The MEL Policy on Evaluations and Reviews recommends all projects include independent reviews and provides guidance on how to collect information on DAC principle of sustainability.

In addition, our [Impact Monitoring Approach](#) helps us gain a better understanding of what works in the fight against corruption, why and how it works. The approach is highly participatory as it requires and actively promotes the involvement of both internal and external stakeholders and constituents. The Impact Monitoring Approach also provides guidance on how to monitor wider impact, including on the areas of policy change and institutional change as well as behaviour change, which might be particularly relevant in the areas of outreach and awareness. Projects increasingly include documentation of longer-term impact, which speak to capacity developed or institutional strengthening in the final reviews, (for example: Action Grant Final Evaluation) or upcoming TEACAC Impact Stories, or through impact review workshops (for example, mapping against the TI Impact Wheel).

A very good example is the (internal) ALAC Impact Stories Database developed over time, which has been used to document examples of impact of ALAC support and in some cases also share particularly demonstrative stories, for example:

<https://www.transparency.org/en/publications/speaking-up-locally-driving-change-globally>.

We also collect impact stories through different projects (eg in regular reporting), and publish these as blogs or other pieces. For example: <https://www.transparency.org/en/blog/pakistan-power-of-being-informed-right-to-information>.

F. OUR ADVOCACY WORK ADDRESSES THE ROOT CAUSES OF PROBLEMS

1. How do you identify and gather evidence regarding the root causes of the problems you address and use this to support your advocacy positions?

Understanding the context, causes, and consequences of the problem we want to solve is a key element of our advocacy strategies and for the last 25 years, For the last 25 years, TI has committed to use an evidence-based approach to our global advocacy efforts. As the Research page on the TI Website states: “To end corruption, we must first understand it. That’s why we look at what causes corruption and what works against it. We informant-corruption advocacy and policies through evidence to hold governments and businesses to account”.

TI’s research focusses on 4 major pillars to understand the root cause of corruption:

- **Diagnosing:** TI measures corruption and identify areas of reforms through our global measurement tools (CPI) & (GCB), as well as country level assessments: national integrity assessments (NIS), and sector level assessments: business integrity country agenda (BICA). TI also uses the CPI to generate evidence and identify correlations with important policy issues. Since 2017, we have coupled the CPI to topics such as:
 - Social inequality and populism (2017).
 - The shrinking space for civil society (2018)- • The crisis of democracy (2019)-
 - Political integrity (2020)-
 - COVID-19 crisis response (2021)
- **Advising:** TI inform policy processes by generating/compiling evidence through our knowledge services (Anti-Corruption helpdesk and multi-country research projects in support of our Global priorities). In 2021 for example, the Helpdesk answered 99 requests for research support to inform ongoing policy development processes from the TI movement and bilateral development agencies. All material produced is published and made available to a wider audience on the [Anti-Corruption Knowledge Hub](#) which is evolving into a repository of key AC resources.
- **Monitoring:** TI monitors progress in Anti-Corruption (parallel reporting on UN SDGs, IACC Monitor, Global Integrity Monitor).
- **Innovating:** TI also explores emerging and cross-cutting issues with a focus in recent years on transnational forms of corruption, Linkages between corruption, discrimination and Human Rights, sextortion, shrinking civic space/crisis in democracy/rise of populism, etc. In 2021 for example, TI launched a ground-breaking global report on the linkages between corruption and discrimination “[defying exclusion: stories and insights on the links between discrimination and corruption as well as Access denied? Availability and accessibility of beneficial ownership data in the European](#)”. TI also collected for the first time quantitative data on sextortion in the EU and the Pacific through the GCB.
- The publication of [Access denied? Availability and accessibility of beneficial ownership data in the European in May 2021](#).

2. How do you ensure that the people you work for support your advocacy work and value the changes achieved by this advocacy?

TI-S is in constant dialogue with the members of the movement, allies, governments, regional and global organisations to engender policy changes. However, for impactful advocacy, it is necessary to create the demand for change through public pressure. TI uses various communications tools to seek support from the people whose lives are impacted by corruption, while engaging with the governments to accept policy recommendations. The feedback of this strategy is through analysis of public discourse and impact on that. The national chapters provide feedback during the annual movement summit, which is a platform for the TI movement to exchange information and prepare plans for the coming years. The fact that governments invite TI experts to part of their consultations and rely on TI’s research demonstrates that our contributions are valued and respected.

G. WE ARE TRANSPARENT, INVITE DIALOGUE AND PROTECT STAKEHOLDERS' SAFETY

- 1. Are your annual budgets, policies (especially regarding complaints, governance, staffing/salaries and operations), evaluations, top executive remuneration and vital statistics about the organisation (including number of offices and number of staff/volunteers/partners) easily available on your website in languages accessible by your key stakeholders? Please provide links, highlight membership in initiatives such as IATI and outline offline efforts to promote transparency.**

Most relevant information is at this link: <https://www.transparency.org/en/the-organisation#how-were-funded> including information on our governance, charter, the integrity system, and our institutional relationships. With regards to financial information, the sub-section How We're Funded includes:

- **Budget:** <https://www.transparency.org/en/the-organisation/our-operating-budget>
- **Annual Audited Financial Reports:** <https://www.transparency.org/en/the-organisation/audited-financial-reports>
- **List of donors:** <https://www.transparency.org/en/the-organisation/who-supports-us>

TI-S is complying with the standards of [IATI](#) and [Initiative Transparente Zivilgesellschaft](#).

- 2. What policies do you have in place to ensure a fair pay scale? Do you measure the gender pay gap in your organisation, and if so what is it? What are the salaries of the five most senior positions in the organisation, and what is the ratio between the top and bottom salaries? If this information cannot be provided or is confidential, please explain why.**

TI-S has a standard compensation system ensuring pay equity. The system is based on valuation of the jobs and jobs of similar value are grouped in a salary band (scale). The job holder might move across the band where the job belong based on predetermined factors like years of experience.

The average monthly salary of the lowest earner (Grade 1) is €2,492 compared to an average monthly salary of €7,709 for the highest earners (grade 5). The top 5 (grade 5) gross, monthly salaries in 2019 were: €7,225; €7,264; €8,282; €9,000; €9292. As of 2020 the compensation system has been updated with the support of the Works Council (Staff Representation body) (which was underway in 2019). The system aims to align similar roles to ensure consistent pay practices. Consideration in the development was given to gender factors.

TI-S has a standard compensation system in place to ensure consistent pay practices. All employees fall under the same system and we do not differentiate between internationally and locally hired employees.

- 3. How do you ensure privacy rights and protect personal data?**

TI-S takes the protection of personal data of staff, supporters and partners seriously. The Data Protection Officer and the IT Manager meet on a fortnightly basis to discuss ongoing and emerging data protection, information security and compliance issues.

The updated privacy notice from end of 2021 is not only regulating the processing of personal data of website users. The reference to website users is only one section (section 4.) of the privacy notice. The notice also covers the processing of personal data for many other cases, like job applicants, suppliers, the network of experts and more.

We take data erasure requests and other data subject requests very seriously. In case of data erasure request we will identify all personal data we hold on the data subject to then determine which personal data must be deleted, which will in general be done within one month. We keep the data subject informed about the deletion process and in case the process takes additional time.

The privacy of staff is protected by a works agreement which governs the types of logging and monitoring activities which can be undertaken by the TI-S technology team.

Personal data of supporters is stored securely in Salesforce, with all accounts which have access to that data protected by multifactor authentication as a minimum standard. The use of Salesforce is again governed by a works agreement.

The approach to privacy for visitors to the TI website is laid out in the privacy policy under <https://www.transparency.org/en/privacy>

There is a separate privacy policy for donors of TI under <https://www.transparency.org/en/donor-privacy-policy>

4. Who are the five largest single donors and what is the monetary value of their contribution? Where private individual donors cannot be named due to requested anonymity, please explain what safeguards are in place to ensure that anonymous contributions do not have unfair influence on organisational activities.

[TI's donations policy](#) requires that all donations exceeding €1,000 are individually disclosed in our annual audited financial statements.

The publication of the names of individual donors is subject to their data protection consent.

The five largest donors in 2021 were:

- European Commission (€3,736,494)
- Swedish International Development Cooperation (€2,489,221)
- BHP Foundation (€1,176,597)
- Australian Department of Foreign Affairs and Trade (€1,164,900)
- Bundesministerium für wirtschaftliche Zusammenarbeit und Entwicklung (€872,257)

CLUSTER C: WHAT WE DO INTERNALLY

H. STAFF AND VOLUNTEERS ARE ENABLED TO DO THEIR BEST

1. Provide evidence that recruitment and employment is fair and transparent.

TI-S has Recruitment Guidelines which ensure that recruitment processes are fair and consistent. Available employee statistics (see Annex 1). Other than the name guidelines implies, those rules are mandatory for all stakeholders participating in TI-S recruiting.

The TI-S Recruitment Guidelines set out both, the recruiting process, as well as roles and responsibilities of the employer (TI-S) and the TI-S Works Council in particular. The guidelines get regularly updated in collaboration with the TI-S Works Council. The TI-S Works Council has co-determination rights in the area of recruiting.

The selection process outlined in the guidelines typically involve several colleagues in interviewing panels to allow for a diversity of different perspectives to inform the hiring decision of hiring managers who are typically the Team Managers of the hiring team in question.

The process is organised from beginning to end by the recruitment specialist of the Human Resources Team in line with the Recruitment Guidelines and in close coordination with all stakeholders involved.

2. What are you doing to invest in staff development? What indicators demonstrate your progress? What are your plans to improve?

TI-S has a Learning & Development Policy; however, initiatives will always be adapted to be in line with the given budget for a year.

Trainings in 2021

- Fraud Training (mandatory)
- Presentation Skills (in coordination with Team Manager)
- Social Media Learning sessions facilitated by Communications Team (voluntarily)
- Unconscious Bias Training (all staff)
- Wellbeing Webinar (all staff)
- Integrity System plus Awareness Training Sexual Harassment (mandatory)

3. How does your organisation ensure a safe working environment for everybody, including one free of sexual harassment, abuse, exploitation or any other unacceptable conduct? What indicators demonstrate your progress? What are your plans to improve?

How does your organisation ensure a safe working environment for everybody, including one free of sexual harassment, abuse, exploitation or any other unacceptable conduct?

Our Secretariat's staff conduct:

Our Secretariat's Integrity System and HR policies are the main instruments to safeguard against potential misconduct perpetrated by our own staff in this area. Our Code of Conduct explicitly covers discrimination, harassment and bullying, sexual harassment, exploitation and abuse and child abuse (see section 6). Safe channels are published on our website and are available for staff, chapters, and other 3rd parties to report misconduct. We also have specific policies owned by our HR department about the prevention of sexual harassment and exploitation (PSEAH) and Child protection.

Links to supporting documents:

- [TI S Code of Conduct](#)
- [TI S Integrity violation reporting policy](#)
- [TI S PSEAH policy](#)
- [Anti-Harassment policy for TI organised events](#)
- [TI S Child protection policy](#)
- TI S Grievance policy (not published externally as under review)

What indicators demonstrate your progress?

Our employee survey measures the perception of staff regarding how safe they feel in their work environment.

Our Integrity violations are tracked. From a statistical perspective we consider this year as a baseline. A year-on-year analysis will be executed forward and will take onto account the number of cases, the level of seriousness, their outcome.

I. RESOURCES ARE HANDLED EFFECTIVELY FOR THE PUBLIC GOOD

1. How do you acquire resources in line with your values and globally-accepted standards and without compromising your independence?

TI is mainly funded through grants and donations from governments, multilaterals, and foundations, with a small amount of individual and corporate income. There are a range of TI-S and TI policies that cover fundraising, and TI-S is currently in the process of a full policy review which will update our policies to ensure they are in line with best practice, and to fill any potential gaps. One of the key policies is the [TI Donations Policy & Guidelines](#).

TI works with donors who have a clear commitment to the action-based programme required to deliver a world free of corruption. The commitments to the anti-corruption agenda fall within the strategic or tactical priorities of the different donor groups (governments and foundations in particular).

2. How is progress continually monitored against strategic objectives, and resources re-allocated to optimise impact?

The organisation approves their annual budget prior to the beginning of the fiscal year and monitors resource allocation on an ongoing basis. Detailed reports are reviewed monthly.

Small variances within a given cost center may be addressed by reallocations operated by the project manager in consultation with the project accountant.

Larger budget reallocations are, according to the organisational structure, administered by the Chief Executive Officer and (on limited areas) the Chief Administrative Officer who are in charge of budget changes and reallocation. In their decision-making, they are supported by two collegial bodies:

- the Strategic Workforce Planning Group (SWG, comprised of Head of HR; Head of Finance; and Chief Administrative Officer) in cooperation with relevant team managers administers new hires and changes in staff remuneration.
- the Resource Mobilization Group (RMG, including Head of Fundraising; Head of Finance; Head of Policy and Advocacy; Head of Global Movement; and Chief Administrative Officer) decides on entering new business and may discuss reallocations of existing resources if significant deviations from the budgets are noted.

3. How do you minimise the risk of corruption, bribery or misuse of funds? Which financial controls do you have in place? What do you do when controls fail? Describe relevant situations that occurred in this reporting period. What are your plans to improve?

The organisation has a robust internal control environment to minimize risk of fraud and corruption. Financial statements are compiled under International Financial Reporting Standards (IFRS) and audited on a yearly basis. Processes exist to ensure independence of the auditor.

Finance staff includes qualified accountants, affiliated to major international charters, such as Association of Chartered Certified Accountants (ACCA) and Association of Chartered Accountants (ACA).

The internal control environment is formalized and includes a financial manual, a detailed delegation of authority policy and an internal control matrix which are actively enforced. The organisations finances are operated through an established Enterprise resource planning (ERP) system, Microsoft Business Central.

Detailed trainings to minimize the risk of fraud and corruption are developed internally, including provisions to guide reporting and investigation of concrete cases of corruption. Trainings are provided also to project partners. Starting 2021, all TI-S staff are required to attend a yearly anti-fraud training. Trainings to partners are held as part of projects being jointly undertaken and therefore their frequency may vary.

Risk management is an established practice in the organisation. The risk management system follows the COSO methodology and the Finance and Audit Committee of the Board, which meets quarterly, is actively updated on developments in organisational risks. Moreover, routines are developed to make sure financial risks at the project partner level, including fraud and other internal control failures, are monitored and managed, especially when sub-granting is involved. These processes, known as C-FRA, has been established in 2015 and since then improved based on a continuous learning from data gathered in the field.

The process of the mentioned investigations is outlined in the policies themselves. The Integrity Manager keeps a record of all cases may they be pending or closed.

J. GOVERNANCE PROCESSES MAXIMISE ACCOUNTABILITY

1. What is your governance structure and what policies/practices guide replacing and recruiting new trustees/board members?

Per its charter Transparency International has the following organs: Executive (named Chair and Vice-Chair), Chief Executive Officer, Board of Directors, International Council (IC), and the Membership Meeting.

The organisation is a German association with an office in Berlin. It has 97 corporate (National Chapters) and 5 individual members. The membership gathers once a year in the highest decision-making body called the Membership Meeting.

The Board of Directors is the supervisory organ, whereas the Executive and Chief Executive Officer form the executive arm. The IC is the expert body of TI.

Eight Board Members as well as the Executive are elected directly by the Membership Meeting for a term of three years by the Membership Meeting. The pool of eligible candidates consists of the TI members and the IC members. Two additional Board Members may be co-opted by the Board of Directors from the pool of International Council members. Those co-opted members of the Board must be confirmed by the following Membership Meeting. With the Chair, Vice-Chair, ordinary Board Members and two independent Board Members, the Board of Directors has 12 members in total.

Diverse representation on our governing bodies is one of the guiding principles of TI laid out in A Statement of Vision, Values and Guiding Principles for Transparency International. The Board maintains a so-called competency-diversity matrix in which the body tracks how the Board is constituted. That way the Board identifies potential gaps in both competency and diverse representation.

The IC maintains the same matrix and shares it with the Board. That way the Board can appoint individuals to the IC who belong to groups that are either under-represented or whose expertise is missing in the IC.

2. How does your board oversee the adherence to policies, resource allocation, potential risks and processes for complaints and grievances?

The Board has established a Finance and Audit Committee which oversees adherence to financial policies, the effectiveness of internal control system, financial risk monitoring at the movement level and risk management. The Finance and Audit Committee endorses the budget and the audited financial statements before the Board of Directors. The Membership Meeting approves the audited financial statements, the Board of Directors approves the budget.

The Board Ethics Committee (BEC) is mandated by the Board to advise the Board, its Committees, and the TI Movement (including National Chapters, Individual Members, Executive, CEO, International Council) on principles, structures, and processes to foster the highest standard of ethical conduct in the activities of Transparency International (TI).

In 2021, this Committee was aiming to meet once a month. the BEC met 9 months out of 12. The attendance rate based on the 9 occurrences of meeting was 97%. Key achievements in 2021 included:

- the draft of a guideline for our Chapters to support the establishment of local Anti-Harassment policies
- the annual reporting to the Membership Meeting
- the handling of cases escalated or reported to the BEC.

The Governance Committee is tasked with monitoring the overall governance of TI and the accountability of its acting organs. Once a year the Committee conducts a Board Self-Evaluation whose results are shared with the Membership Meeting, either at the Meeting or afterwards.

The Terms of References of each Board Committee and their composition can be found on our website [HERE](#).

3. What processes and mechanisms does your organisation have in place to handle external complaints including those relating to unacceptable conduct of your staff, volunteers, or partner organisations? Please provide an overview of the number and nature of complaints in the reporting period, how many of those were valid, and of those that were valid, how many were appropriately handled and resolved.

The external (website) publication of statistics is planned on a yearly basis. The statistics for 2022 will be published externally in Q1 2023. The reason for not externally publishing in 2021 was a challenge in the continuity and reliability of data. This is because a new Integrity System was implemented in Q4 2021. Additionally, the person responsible for tracking and statistics left in July and was replaced in early December. We took the position that 2021 wasn't reliable enough to publish externally and we consider 2022 the reliable baseline under the new Integrity System.

Unpublished statistics for 2021 can be found below - these statistics include internal and external complaints.

Concerns recorded (2021):

19 contacts were made with the Integrity System to raise a concern, 3 were not related to an integrity concern but could be answered or rerouted.

Of the 16 integrity concerns raised 14 cases were closed and 2 were in progress as of 31st December 2021.

Upon review and investigations for the cases closed (14):

- 43% were found non substantiated (6)
- 36% were referred (5)
- 21% were substantiated (3)

General themes:

- Perceived misconduct (all cases regardless of their outcome): main theme is respect
- Actual substantiated misconduct: main theme is also respect during collaboration including in conferences and workshops

Case Management (2021):

- 87.5% of the cases received in 2021 are closed (as of 31st Dec 2021)
- The average time to closure is 21 days for cases not referred

4. How are internal complaints handled? Please provide an overview of the number and nature of complaints in the reporting period, how many of those were valid, and of those that were valid, how many were appropriately handled and resolved.

One internal complaint (grievance) was registered in 2021. As the affected employee did send the Grievance to HR after he had left, the process could not be finalized. However, a meeting was done with the accused employee.

5. How do you make decisions about the need for confidentiality and protecting the anonymity of those involved?

Complainants within the TI Integrity System have full control at any point whether or not they want to file a complaint anonymously or not. TI is not publishing any complaint's personal data which may help identifying the complainant.

In addition, complainants may choose to report to a registered lawyer, the external whistleblowing point, who has legal privileges. For details refer to the [Code of Conduct](#) and the [Integrity Violations Reporting Policy](#).

For suspected or confirmed Integrity violations reported through whistleblowing channels:

For the number of complaints throughout the reporting period, please see J3. Please consider that in the period 2021 only one report was made anonymously. One additional report was made disclosing identity and several weeks later we were asked to anonymise. This unfortunately was no longer possible.

Our Secretariat's whistleblowing channels allows anonymity by choice and confidentiality by default. In 2021 the decisions and safeguards were largely based on policy and trust. In 2022 we are developing operational safeguards. We are also putting an emphasis on this during new joiners' trainings.

From a data access request perspective, the disclosure of personally identifiable information in relation to whistleblowing cases is subject to provisions in the GDPR allowing the rejection of an information access request to protect legal interests (EU Whistle-blower protection liability and information supporting a legal and insurance claims). Additionally, our external channel (Ombudsman) has privileges and control over the personally identifiable information voluntarily shared by the reporting party.

K. LEADERSHIP IS DEDICATED TO FULFILLING THE 12 COMMITMENTS

1. How is the governing body and management held accountable for fulfilling their strategic promises including on accountability?

The Board of Directors is conducting an annual self-evaluation whose results are presented at the Annual Membership Meeting or afterwards. Both, Board of Directors and Chief Executive Officer are preparing reports for the Annual Membership Meeting. In the reports both organs list their activities, milestones and fulfilled objectives.

The Chief Executive Officer is reporting on a monthly basis to the Board of Directors. Team Managers provide input to those reports for their respective area of work.

Performance of the Chief Executive Officer, Chief Administration Officer and Team Managers is assessed – as for every staff member – via annual objectives.

2. What steps have you taken to ensure that staff are included in discussing progress toward commitments to organisational accountability?

At TI-S we conduct participatory planning processes when developing our Implementation Plans, Annual Plans and corresponding monitoring processes. This means, that we ensure that all staff have the opportunity to join discussions, review documents and provide their thoughts and input. We organised a session to discuss the Accountability Report with teams across TI-S that contribute to the improvement of our organisational accountability.

Employees are involved in decision-making processes in many ways:

- Regular 1:1 meetings are held between supervisor and employees
- Regular meetings are held within the team
- The Works Council also organises quarterly works assemblies and bi-monthly coffee chats where employees can provide feedback and raise concerns.
- The Chief Executive Officer organised monthly *Ask-me-anythings* (AMAs) provide employees the opportunity to ask anonymous and non-anonymous questions and voice their opinions.
- Once per year an anonymous staff survey is conducted.

3. What is your accountability report's scope of coverage? Are you reporting for the whole organisation or just the international secretariat? For secretariats of international federations, on which issues of accountability (or relating to Accountable Now's 12 commitments) do your members report to you on, and with what frequency? Where there is no routine reporting, how do you use your coordinating functions to elevate attention to accountability issues throughout your federation?

The description is related to the organisation in Berlin named Transparency International e. V. including its office in Washington D.C. USA. The report mainly uses the abbreviation TI-S in order to differentiate to the many independent TI chapters. Sometimes TI is used, too, but mainly to describe movement-wide activities or when moving to the organisational structure level.

The related but independent entities are *TI EU* registered in Belgium, and *Friends of Transparency International* registered in the US. TI is demanding that its National Chapters comply with local laws as well as the TI Charter, TI Umbrella Statement, TI Conflict of Interest Policy, and the Accreditation Agreement.

ANNEX 1: EMPLOYEE METRICS

Year	Apr-21
Number of Staff	108
of which Interns and temps	0
average grade	PF3
average years at TI	5.7
average age	38.5
female %	52%
male %	48%
# of Nationalities	36
of which are non European	20
of which are European	16

ANNEX 2: SUSTAINABLE TRAVEL POLICY



BUSINESS TRAVEL POLICY
ISSUED BY: Finance
APPLICABLE TO: Finance
LAST UPDATED: 09 Oct 2020
DATE OF NEXT REVIEW: 09 Oct 2021
VERSION: 1.0

SUSTAINABLE TRAVEL POLICY

1. INTRODUCTION & PURPOSE

The purpose is to provide a clear process pertaining to the approval and reimbursement of travel performed on behalf of TI-S, making sure accountability, value for money, environmental sustainability and personal safety are duly considered.

2. SCOPE

This policy is for all individuals being funded by TI-S for business travel. This includes TI-S staff, TI Board members, Chapter representatives, volunteers, and consultants. In this policy we refer to "travel" meaning a trip made for business purposes (whether it be within Berlin or another location). It does not include travel to and from home to the office.

3. POLICY STATEMENT

Approval

All travel and associated costs must be approved before any bookings are made. Approval is requested through the HR management system, HR Works, by entering the trip in the relevant section. When entering the trip, an employee must include details on destination and an estimate of the maximum expenditure for each expense line (e.g. mode of transport, hotel, etc.). They also must fill out a Travel SAFE form and forward it to the approving Team Manager to be included with their HR Works request.

Travel must comply with organizational standards on employee safety, environmental sustainability and value for money (VFM) as defined in the **Sustainable Travel Manual**. Failure to comply with VFM, security and sustainability guidelines may result in denial of

approval or, if noted ex-post, in reduced or nil reimbursement of certain expenditure items. Travel insurance is required for all trips and automatically provided where the traveller uses the one-time use credit card or one of the travel agency listed in the Manual. In instances where travel is paid for by a third party, a Travel Request is still required through HR Works (even if there is no cost to TI). This allows Finance-Travel to ensure proper travel insurance is provided to our staff.

Team Managers provide approval to the request after considering several factors, including security. Team Managers provide approval within 5 working days. The employee can finalize their bookings only upon approval.

Eligible expenditure

Costs for travel (flights/trains/coaches) to and from the destination as well as the accommodations are paid for by TI-S directly (via credit card or the use of the travel agency). Any air, train, or coach fares for business travel not purchased using a listed travel agent or a TI credit card, where TI-S is covering the cost, will not be reimbursed.

Other travel costs (i.e. transit to and from hotel and workshop) are reimbursed upon return from travel. For subsistence, per diems are recognized based on standard rates. For further detail on eligible expenditure please review the **Sustainable Travel Manual**.

Reimbursement process

Within two weeks of returning from a trip, the traveller must submit receipts along with the TCR reimbursement form, by dropping them in the Finance in-tray. Additionally, they need to fill in the Back to Office Report Form on Office 365. Finance processes the reimbursement in a maximum of 10 working days when documentation is complete, compliant and approved. In case the traveller fails to submit complete and compliant documentation for 60 days from the end of the trip, per diems will not be paid.

TI-S may issue corporate credit cards in order to finance travel costs. Staff planning to travel more than 5 times over a 12 months period are required to obtain a corporate credit

card. Staff using railway transportation more than 5 times over a 12 months period are required to use a Bahn card, reimbursed by TI-S.

4. EXCEPTIONS TO THE POLICY

In case of emergency, including healthcare emergencies, the MD, in consultation with Human Resources and SAFE, may suspend the application of this policy and apply special processes tailored to the conditions.

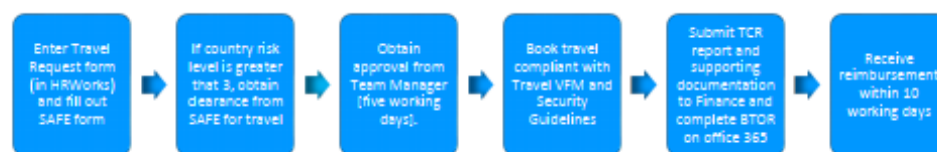
If the traveller cannot fill out the appropriate documentation within the required time, they must request an extension to the Head of Finance, indicating how circumstances make it impossible to comply with the policy.

If the VFM guidelines cannot be complied with, a meeting will be held with Finance-Travel before travel is approved to ascertain the validity of the exception and to see other options that might allow for the compliance of the guidelines.

If safety and environmental sustainability guidelines cannot be complied with for a given trip, but performance of the trip is still deemed necessary, authorization by the CAO is deemed necessary.

If a traveller does not obtain a corporate credit card or Bahn card, and travels 5 times within a 12 month period, they may be denied approval of further travel until the relevant card is issued.

5. PROCESS



6. RELATED DOCUMENTS & ADDITIONAL INFORMATION

Travel Authorization Request form (in HRWorks)

Sustainable Travel Manual
TCR reimbursement form
SAFE Form (In Office 365)
Back To Office Report (BTOR) (In Office 365)

7. REVISION HISTORY

VERSION	DATE	SUMMARY OF CHANGES	AUTHOR
1.0	23 September 2020	New draft Policy	CL • Finance
1.1	9 October 2020	Final review	AG • Finance

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