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Implementation Plan 2021-2022
Transparency International Secretariat

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FOREWORD

It is with great pleasure that I present the Transparency International Secretariat’s (TI-S) Implementation Plan 2021-2022 for Holding Power to Account: A Global Strategy against Corruption 2021-2030. This Implementation Plan is the road map the secretariat will use for the next two years to contribute to the ambitious goals that our movement has collectively set out in our strategy.

We face a complex and challenging future, and 2020 has exemplified what is to come in the next 10 years. The world is changing at an ever more rapid pace, with increasing social and economic inequality, climate crises, the rise of nationalist and populist politics, diminishing institutional trust and more. These trends mean corruption threats continue to grow, and these challenges are only accelerated by global crises such as the COVID-19 pandemic.

These challenges, however, come with great opportunities. Since our last strategy cycle, we have seen greater global understanding and awareness of corruption, increases in anti-corruption laws, reforms and political participation, and enhanced digital engagement paired with technological advances. In addition to the systemic changes we continue working toward; we aim to create a safe environment for citizens to demand accountability on their own initiative by enforcing anti-corruption frameworks, better utilising public data and using technology to their advantage.

At TI-S, we are honoured to work with and through the Transparency International movement in the fight against corruption. We are at a crossroads, where society, enabled by technology and political leadership, will make a great leap either forward for the better or for the worse. This Implementation Plan outlines the ways we believe TI-S can make the biggest impact, together with our movement, to Hold Power to Account and drive society towards a better future.

I look forward to working with all of you to achieve a world free of corruption.

Daniel Eriksson
Interim Managing Director
INTRODUCTION

*Holding Power to Account: A Global Strategy against Corruption 2021-2030* outlines what it will take over the next decade to fight corruption and achieve a more positive future.

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;
- **Enforcement** – accelerating the enforcement of anti-corruption standards for accountability; and
- **Social Oversight** – activating strong, active vigilance and engagement to protect the common good.

The 10-year timeframe of the strategy is divided into three strategic cycles, with the first cycle of two years focusing on the urgent global priorities in response to the COVID-19 pandemic.

The COVID-19 pandemic has irreversibly changed our world, and that has huge implications for anti-corruption, government and development. When faced with extraordinary circumstances, governments often resort to extreme measures leading to greater inequality and human rights abuses, along with weakened state capacity and checks and balances. However, the pandemic has also emphasized the importance of citizen engagement and accelerated global use of technologies that may better facilitate calls to action.
ABOUT THIS PLAN

The TI-S Implementation Plan acts as a bridge between the Strategy 2030 and TI-S Annual Plans. Based on the objectives and outcomes set out in the Strategy 2030 for the movement and focusing on the first two-year cycle, this plan outlines the goals that will drive the secretariat’s Annual Plans for 2021 and 2022.

The goals of the secretariat include programmatic goals and commitments about new ways of working. We have separated these two areas into ‘Programmatic Outcomes’ and ‘Making it Happen’.

The process for developing these goals involved facilitated planning sessions with colleagues who have proven expertise and experience in the topic areas outlined in the Global Strategy 2030. The purpose of the planning sessions was to brainstorm, discuss and outline where we want to be at the end of the first strategic cycle (2022). Draft outcomes were shared with all members of the secretariat for feedback and mapped against the Strategy 2030 to address any potential gaps.

The TI-S Implementation Plan concludes with key elements of our approach to monitor our impact. Overall, the Implementation Plan remains high-level, thereby fulfilling its remit of a two-year, forward-looking document. It will be complemented by Annual Plans and budgets that are operational in focus, but that derive from the contributions set out in this document.
ROLE OF THE SECRETARIAT

As the international secretariat to the Transparency International movement, TI-S fulfils specific roles that determine the contributions we will make to our strategy, *Holding Power to Account*. Our primary roles on behalf of the movement are as follows:

**Promoting national advocacy and establishing strategic presence**

TI-S supports chapters and, where relevant and appropriate, chapter networks, in creating advocacy opportunities to achieve influence and impact on the issues they identify as critical. As the international secretariat of a global movement, we help translate the global imperatives of our anti-corruption work into local relevance and vice versa.

**Supporting a movement that is professional, accountable and sustainable in its impact**

TI-S supports a movement that itself upholds the governance standards that it advocates for and that continuously strives for organisational excellence. The secretariat invests in human resources, training and learning to raise professional standards and foster resilience across the Transparency International movement. We also help members of the movement focus on achieving the changes and impact identified in our common strategy, *Holding Power to Account*.

**Leading global and regional advocacy, including policy, communications and campaigns**

TI-S focuses on achieving transformational change on issues of global and regional relevance. Building on the work of TI chapters on the ground and our own expertise, TI-S works through a range of alliances and partnerships to drive targeted anti-corruption advocacy priorities, providing both thought leadership and bottom-up, evidence-based voice to the movement's demands for change around the world. TI-S ensures that our movement is a key point of reference in the global debate on anti-corruption.

**Advancing the development, dissemination and use of innovative anti-corruption knowledge, tools and approaches**

TI-S identifies the specific knowledge, tools and approaches of value to our internal and external stakeholders, while ensuring that they are contextualised and effectively shared. Our focus is on learning from what has worked to stop corruption. We also identify knowledge gaps, facilitating innovation in new tools and approaches to assist the movement in achieving its collective ambition via action-orientated research. At the same time, we support enhanced and targeted learning across the field of anti-corruption researchers and practitioners.

The outcomes in the pages that follow are those that TI-S will contribute to, working in partnership with over 100 chapters and external stakeholders in the Americas, Europe and Central Asia, the Middle East and North Africa, Sub Saharan Africa and Asia Pacific. The roles outlined above distinguish TI-S and its contributions from those of other parts of the movement, yet the roles are supportive of each other and of a movement that is much more than the sum of its parts. Many of the secretariat's contributions to *Holding Power to Account* involve more than one of the above roles.
PROGRAMMATIC OUTCOMES

The implementation of the 10-year strategy offers an opportunity for the secretariat to lead global advocacy efforts on a variety of crosscutting anti-corruption themes, while leveraging and coordinating with our movement to hold power to account.

TI-S will contribute to the following objectives of the global strategy as described below: 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.

During this first 2-year cycle, the secretariat will not actively contribute to global strategy objective 7) Build Community Leadership against Corruption. As noted in the global strategy, this objective is a longer-term goal, which will require significant investment to achieve. Over the next two years, the secretariat will continue to build its network and expertise in this area in order to meaningfully contribute to this objective in subsequent implementation plans.

PROTECT THE PUBLIC’S RESOURCES

The secretariat will strengthen its role in protecting public resources in the aftermath of the pandemic and the recovery phase to follow.

To achieve this, in collaboration with national chapters, TI-S will revamp its work on clean contracting through new and revised policy and governance standards that address bribery and corruption risks in the management of public resources and contracting procedures. With transparency and openness as our essential and unequivocal demand, we will work to develop a new generation of civic and independent control mechanisms. These will bring improved and inclusive instruments for civil society to track government spending and monitor critical investments and public contracting procedures, such as those in the climate domain or during emergencies.

Moreover, the secretariat will ensure that contracting information is publicly available and accessible, that transparency standards are put in place, and encourage digitalisation to support cleaner procurement.

Based on the strategic use of public data, TI-S will develop and test tools for meaningful participation of affected communities, as well as initiatives to target financial services and regulations that enable corrupt behaviours in public contracting. These tools and initiatives will support individuals and communities to take action to expose corruption and/or mobilise against public sector bribery and abuse, and positively influence actions taken by competent authorities to sanction bribery and abuse or close loopholes.

STOP FLOWS OF DIRTY MONEY

The lack of transparency, accountability and integrity in financial systems comes at a great cost, facilitating the flow of illicit funds. It undermines the social contract and drains resources from the public. In contributing to the ambitions of the Strategy 2030, TI-S will leverage the work of our movement to strengthen and implement global, regional and national standards in the area of financial secrecy, advocating for beneficial ownership transparency, open real estate data and against Golden Visas (citizenship by investment). We will undertake global
campaigns to promote changes in line with the achievement of Sustainable Development Goal 16.

The secretariat will also increase exposure of and enforcement actions against enablers of cross-border corruption; designing research tools and assessments and producing case studies to identify and expose actors facilitating corruption, including banks, lawyers, accountants, real estate agents and luxury goods dealers. We will also continue collaborating with investigative journalists to expose perpetrators and enablers of corruption. The secretariat will lead global campaigns on the role of businesses in cross-border corruption and expose the involvement of professional intermediaries such as banks and service providers when they facilitate corruption. We will advocate in international fora for improved standards on financial transparency and countries' effective compliance. We will engage with professional intermediaries, or ‘gatekeepers’, to promote improved standards of practice, guidance and overall change in behaviour. These outcomes will help create a level-playing field, reducing the opportunities for the corrupt across the globe to hide and conceal assets.

SECURE INTEGRITY IN POLITICS

The Transparency International secretariat will work alongside national chapters to improve the ability of civil society actors and oversight bodies to detect, expose and counter undue influence of private interests in elections, legislation and government decisions through enhanced detection tools and political integrity-proof system design. The secretariat’s approach is three-fold: knowledge generation, detection and policy advocacy. Based on the systematised catalogue of political integrity policy recommendations produced in 2020, TI-S will work jointly with national chapters and peers to deepen the evidence base and develop improved standards. Secondly, we will assist the design and roll out of tools, systems and methodologies aimed at detecting, exposing and countering breaches of political integrity to deliver on national and international initiatives. Finally, we will build coalitions for assertive communication and advocacy to support global, regional and national efforts to improve political integrity open data standards, policy frameworks for wider consultation, and detection and countering undue influence in political decisions.

DRIVE INTEGRITY IN BUSINESS

As governments and communities face growing inequality as well as environmental and economic disruption, business commitment to responsible and accountable conduct is central to the Strategy 2030 aim of ensuring entrusted power is discharged for the common good. Transparency International recognises that many businesses have reached a certain level of maturity in their Anti-Bribery and Corruption programs however; there is not a corresponding decrease in bribery and corruption. Instead, there continues to be an acceleration of cases brought by national governments, scandals, business losses and consequent reputational damage. For TI-S, driving integrity in business means supporting a fundamental transformation: from compliance driven (“prevent and detect misconduct”) to integrity driven (“responsible self-conduct”) approaches. The secretariat will encourage business leaders to be key drivers of integrity management and hold power to account in decision-making.

To contribute to this objective, TI-S will form an independent expert forum bringing together business leaders, investors, compliance professionals, customers, communities and other stakeholders to respond to increasing expectations from various stakeholders. Through the development of key performance indicators and a benchmark survey on state-of-the-art practices developed by Transparency International, this expert forum will develop tools to measure integrity implementation progress from design of companies’ compliance programs to implementation and companies’ operational performance. Lastly, TI-S will implement industry-specific and risk-tailored education programs, together with experts from the movement.

PURSUE ENFORCEMENT AND JUSTICE

As the Strategy 2030 underscores, pursuing enforcement and justice underpins all other objectives by creating mechanisms of accountability for entrusted power. Over the course of the last fifteen years, there has been progress in strengthening anti-corruption frameworks. Most countries have ratified or acceded to the UN Convention against Corruption, passed laws criminalising corruption and established specialised bodies to prevent and punish it. However, corruption remains pervasive at all levels, in part
due to a lack of enforcement. Over the next two years, the secretariat will focus on supporting change in national laws, policies or practices of the diverse range of authorities tasked with combating corruption. We will research, identify and promote best practices on enforcement, while supporting national chapters in their efforts to work with authorities at the national level, ensuring they are equipped with safe and effective reporting mechanisms to act on reports of corruption.

Several barriers impede legal accountability for cross-border corruption and crime. Authorities are often reluctant to open investigations into complex transnational cases due to lack of capacity, challenges to mutual legal assistance or diverging priorities. State capture and undue influence help perpetrators evade justice or get away with lighter offences and inadequate sanctions, if any. To pursue legal accountability for grand corruption we will work with authorities, alerting them of wrong doings and making legal submissions for accountability, remedies for victims and asset recovery. We will leverage our partnership with investigative journalists to ensure that their reporting translates into legally actionable information. Impunity for grand corruption should be addressed by the international community as a matter of priority because of its grave negative impact on human rights, security and development, blocking achievement of the Sustainable Development Goals. TI-S will advocate globally – at the United Nations, G20 and other relevant fora – to push states to take more decisive action to strengthen the international accountability framework, facilitate prosecution in cross-border cases and restitution to victims through new rules on asset recovery.

EXPAND CIVIC SPACE FOR ACCOUNTABILITY

As highlighted in the Global Strategy 2030, integrity and accountability rely on the ability of people, community groups, whistleblowers and the media to stand up for what is right, expose abuse of power, pursue civic rights and remedies, and trigger political change. However, in order to do so; they need a safe and conducive environment, as well as appropriate opportunities to demand accountability.

The dire consequences of retaliation for exposing wrongdoing continues to act as a severe deterrent for whistleblowers, activists, journalists and others to speak up and protect the public interest. Over the next two years, TI-S will continue to support national chapters in their advocacy efforts at the national level to improve the protection of and enable whistleblowers, activists, civil society organisations and journalists.

The secretariat will undertake advocacy actions at global, regional and national levels to improve legal, institutional and organisational frameworks and create conducive environments for citizens to report corruption and demand accountability. We will develop new tools to enable citizen-focused initiatives on social accountability and their use by affected communities. Finally, we will increase the availability of safe mechanisms, such as our Advocacy and Legal Advice Centres, for victims and witnesses of corruption to report corruption and seek redress.
MAKING IT HAPPEN

As we know from previous strategies, in order to achieve our programmatic goals, we need to review and improve how we operate within our movement and in partnership with others. We will pursue these changes through the commitments, principles and methods below.

AGILE TIMEFRAMES

Just as Strategy 2030 is divided into three strategic cycles to be more flexible and adaptable, the TI-S Implementation Plan follows the same cycles. The first strategic cycle provides us with the opportunity to review, change and improve how we operate and prepare ourselves for the subsequent four-year cycles. In 2022, we will begin the development of the next TI-S Implementation Plan, based on a movement-wide review of the first strategic cycle and lessons learned.

CONNECTED GLOBAL AND NATIONAL STRATEGIES

From the implementation of previous strategies, we learned that there is no such thing as a self-implementing movement-wide strategy and that to be more than the sum of our parts and increase our impact, we need stronger commitment and alignment with the movement strategy at all levels. While movement stakeholders have their own strategies based on their unique context, these will be informed and reinforced by the collective movement strategy.

TI-S will facilitate a collaborative strategy “translation” and strategic priority setting processes across the movement to define the global goals for the first strategic cycle. Further, we will set up, maintain and develop the Strategy Hub as a one-stop platform for information and knowledge sharing around the Strategy 2030. Finally, we will facilitate needs-based capacity building that does justice to the diversity of our movement and the contexts we are working in to strengthen strategic alignment from the national to global level.

EFFECTIVE COORDINATION, ADVOCACY AND SUPPORT

Transparency International’s current set of organisational policies and frameworks in key areas such as advocacy, fundraising, communication and technology does not enable the most efficient collaboration between the movement’s stakeholders. To activate the strength of the movement and implement the Strategy 2030, an innovative approach to organisational processes, policies and standards is required. The secretariat will undertake a collaborative review among stakeholders to streamline and update these processes, policies and standards, and – in a second step – coordinate with national chapters to make that information accessible in one central place.

Collaboration and knowledge sharing with and from national chapters is dependent on the right tools.
Learning and knowledge management platforms are in place and accessible for most movement stakeholders. However, there is a need for training, streamlining and targeted use of those tools and platforms. Thus, over the following two years we seek to promote and adjust the use of existing learning and knowledge management platforms among movement stakeholders.

**STRONGER PARTNERSHIPS AND PRESENCE**

During the next two years, the secretariat will work towards strengthening and expanding our presence in strategic locations. This includes developing new approaches for countries urgently in need of stronger anti-corruption measures, such as those where civic space is shrinking or those under totalitarian governments. We will strongly focus on strengthening our presence in countries of geopolitical strategic importance like the US, China and India. We will conduct a structural governance review to explore new types of presence and forms of collaboration that go beyond the national chapter to help us be more flexible in challenging environments. At the same time, we will continue to organise, coordinate and implement capacity-building activities to strengthen our existing national chapters’ ability to manage effective organisations and fight corruption.

As coalition-builders, we will work cooperatively with all individuals and groups committed to the fight against corruption. At the global and regional level, we will forge partnerships and join forces with organisations working toward social justice to enhance our collective impact. At the national level, we will increase our support to national chapters in this area by clarifying and strengthening the approach to partnerships and sharing sample tools and templates.

**CORE PRINCIPLES AND METHODS**

To ensure success, we will strengthen our most important ways of working. These include being:

**A. INCLUSIVE AND INTERSECTIONAL**

Corruption perpetuates cycles of exclusion and oppression, exacerbating the effects of marginalisation and denying disadvantaged groups access to goods, services and opportunities. We are committed to adopting an inclusive approach to fighting corruption and mainstreaming diversity, inclusion and intersectionality in our programmes, campaigns and communication, including the perspectives of traditionally under-represented groups. To achieve this vision, in the next two years TI-S will aim to improve standards, policies, capacity and mechanisms to become an inclusive organisation and act against multiple forms of discrimination related to gender, sex, race, class, sexual orientation, religion, disability and physical appearance.

We will strengthen our understanding, knowledge and expertise of diversity, inclusion and intersectionality issues by educating ourselves and facilitating the development of a common language and understanding of these issues across the movement. We will also conduct research on corruption and discrimination, as well as advocate and raise awareness on how corruption affects groups exposed to discrimination.

**B. CLIMATE AND ENVIRONMENT CONSCIOUS**

The secretariat aims to mainstream climate and environmental goals into our TI-S led programmes and projects, campaigns and communication, highlighting the linkages with corruption. Building on our national, regional and global networks, we will identify and strengthen our strategic partnerships with international organisations, academic institutions and civil society organisations engaged in climate and environmental issues to push our agenda forward.

Over the coming two years, the secretariat will ensure that stronger environmental awareness is rooted as an organisational development priority at TI-S with adequate policies, processes, resources, capacity and monitoring mechanisms in place to drastically reduce our environmental impact.

**C. EVIDENCE-BASED**

Over the next two years, TI-S will prioritise the production and innovative use of evidence to achieve our global advocacy goals. We will primarily focus on aligning our research with our policy and advocacy goals by promoting a strategic use of our flagship research products across the movement as well as developing new tools and methodologies to
support the design of our policy recommendations. We will also ensure that an evidence-based approach to our advocacy efforts is mainstreamed in all areas of work across the movement.

The secretariat will support its network of national chapters in generating and using evidence with knowledge exchanges on what works against corruption within and outside the movement, as well as on research tools to diagnose corruption in a specific sector, analyse networks and use available data to uncover wrongdoing. Finally, we will contribute to the sustainability of our research products and tools making sure the findings can be used in numerous ways.

D. TECH-SAVVY

The fourth industrial revolution is changing the way the world works, and it requires us to change our approaches in line with global trends and developments. This new era is defined by a fusion of technologies that is blurring the boundaries between the physical, digital and biological spheres. It comes with new threats to governance and democracy and new ways to abuse power – but also new opportunities to fight corruption.

Against this background, we will increase our expertise and capacity to shape the agenda on corruption. During this first strategic cycle, the secretariat will lead on the development of concepts and policies using new technology to expose and fight corruption. At the organisational level, we will invest time and resources in better using tools and technology to share knowledge, communicate safely and collaborate more effectively within the movement.

E. PROTECTIVE OF OUR PEOPLE

The context in which the movement and civil society, more broadly, operates is increasingly challenging. It is characterised by the growth of populist authoritarian leaders, a weakening of multilateralism, a loss of influence of traditional government allies and the parallel consolidation of new world powers openly hostile to civil society – trends that all result in the increased targeting of accountability activists.

Over the next two years, the secretariat will strengthen its security systems and secure adequate resources to deliver a robust programme to safeguard anti-corruption fighters and support both TI-S and national chapters’ risk management and protection. This will include robust implementation of security standards within TI-S as well as efforts to improve the capacity of national chapters to deal with risks, with processes and procedures in place when incidents occur to reduce the likelihood and impact of security concerns.

F. ETHICAL AND ACCOUNTABLE

To be credible and successful in our strategic goal – ‘holding power to account’ – the movement must embrace efforts to scrutinise transparency, accountability and integrity within our own operations, ensuring and demonstrating that we champion the high standards we expect from others and are willing and capable of addressing the integrity issues we encounter. When they occur, the impact of integrity violations can damage the work and reputation of the entire movement, as we are implicitly and increasingly interdependent in our exposure to risk. It is therefore vital that we strengthen organisational resilience to the risk of integrity compromises in a way that ensures the consistent application of best practice, whilst also recognising the contextual, legal, cultural and political diversity of the movement.

The secretariat therefore commits to greater transparency in the handling of the integrity risks and violations that we encounter, allowing greater scrutiny of the efficiency and effectiveness of our integrity processes and, by extension, commitment to the principles of Transparency International. We will collaborate with other movement stakeholders to establish core principles and standards for the design of effective integrity framework guidelines, as well as mechanisms for greater transparency. Through the development of harmonised principles, shared minimum standards and greater transparency, TI-S will be better able to support other movement stakeholders in designing integrity systems and disclosure mechanisms that are tailored to their needs and context, whilst also working holistically to protect the entire movement.
IMPACT AND LEARNING

Our Strategy 2030 outlines the movement's common goals leading up to 2030. The secretariat will put systems in place that will ensure our accountability and allow us to increasingly take strategic decisions based on a better understanding of the progress TI-S and the movement have made towards our strategic objectives.

We will focus on developing, maintaining and improving a coherent Monitoring, Evaluation and Learning (MEL) framework for TI-S and the movement that is designed to demonstrate progress towards our strategic objectives across different levels, thematic areas, countries and regions. Regular reviews and evaluations will inform learning processes and strategic course corrections. We will improve the packaging, sharing and culture of discussing MEL findings in a way that enables learning and exchange. By doing all this, we remain committed to using result-oriented and participatory approaches, ensuring the involvement of internal and external stakeholders and partners.
To measure the progress and effectiveness of this Implementation Plan, the secretariat will:

- **Conduct annual planning** that establishes targets and a baseline capturing the situation before the implementation of the TI-S Implementation Plan
- **Measure results and impact** according to our bi-annual internal reporting system
- **Develop performance indicators** that provide an overview of the organisation’s performance in defined operational areas, such as finance, human resources, governance, fundraising and communications
- **Produce annual impact reports** providing partners and stakeholders with an overview of highlights, achievements, challenges and reflections at the TI-S level
- **Conduct evaluations** and learning reviews to ensure accountability and learning.
- **Oversee a movement-wide strategy review** in 2022, which will help us course-correct and determine new priorities for the second strategic cycle. The review will assess progress made at the movement level, including the secretariat.

We are committed to fully disclosing our monitoring and evaluation results to the public, making them available on our website and disseminating them as widely as possible.