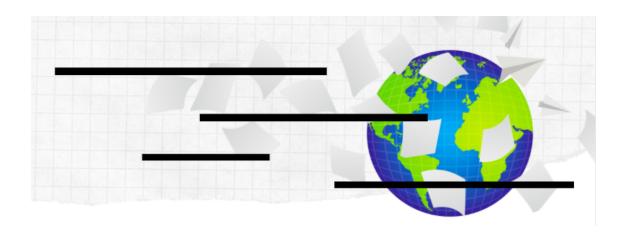


Anti-Corruption Evidence Research Programme



Hello all,

Last month saw the **latest leak of documents** to reveal the vast scale of money laundering enabled by banks and regulators throughout the world. Following the <u>Panama</u> and <u>Paradise</u> Papers, and the <u>Lux</u> and <u>Luanda</u> Leaks, the <u>FinCEN Files</u> once again shed light on how the global elite have been able to move vast sums of dirty money around the world, highlighting how some of the biggest banks and financial institutions have continued to allow suspicious transactions to take place.

At the heart of the FinCEN scandal is the leak of more than 2000 so-called Suspicious Activity Reports (SARs) filed with the US Treasury Department's Financial Crimes Enforcement Network. Details of these files and their links with illegal activities will doubtless **continue to emerge in the coming weeks and months**, but the initial information highlights not just the role of financial institutions, but also - as <u>Oliver</u>

<u>Bullough</u> has pointed out in his Oligarchy <u>newsletter</u> - the **signal failure of western politicians** to properly resource investigators and prosecutors to act on the SARs.

The FinCEN Files' revelations serve to underline the relevance of the focus on this month's newsletter: **promoting integrity in professional fields**, as well as one of the key GI-ACE themes on international architecture, which includes Jackie Harvey's recent piece on <u>practical research on beneficial ownership</u>.

Thank you, Paul Heywood, Director of GI-ACE





Cities of Integrity: Building Integrity in Urban Planners

Our <u>Cities of Integrity research team</u> closed off this year's <u>Southern Africa City</u> <u>Studies Conference</u> by bringing together leading voices on the topic of corruption and the desire for integrity in South Africa's local governance sphere. **Stephen Berrisford**, senior consultant on the GI-ACE project, drew on his extensive experience in urban law and policy to facilitate a <u>frank debate</u>. Moreover, the team launched their <u>first animated video</u> in a series of three, showing the importance of promoting integrity in **urban development**.

The Interdependence of Ethics Codes

Surveying public servants on the (known limited) efficacy of ethics and disciplinary codes, **Jan-Hinrik Meyer-Sahling** and **Kim Sass Mikkelsen** recently

published an <u>article</u> in the Review of Public Personnel Administration on the interdependence of anti-corruption tools. Arguing that we need to consider baskets of tools, or frameworks, in our fight against corruption, the team <u>advocates</u> a move away from distinct and isolated anti-corruption interventions.



Revisiting the Gulnara Karimova Case

John Heathershaw and his team's research has taken a recent look at specific money laundering checks performed on African and Central Asian politically exposed people or 'PEPs' - those who hold positions of political power and their families - in the spheres of banking, real estate, and reputation management. The research looks at real life examples of properties in the UK purchased by such individuals, and examines whether current anti-money laundering regulations are strong enough to prevent potentially corrupt funds from entering the housing market. One infamous example is the £30 million worth of real estate purchased by Gulnara Karimova, the daughter of the first president of Uzbekistan, who lived the high life before her downfall saw her end up in jail.

NEW HIRES welcome to the team!



Ambika Samarthya-Howard

Global Integrity Head of Communications

Ambika comes to us with extensive multimedia experience working with international non-governmental organizations. Having filmed and worked with communities and social change projects throughout Asia, Africa, and the U.S., she is focused on bringing fresh voices and formats to Global Integrity's work.



Aiysha Varraich

Research Fellow

Aiysha has been a PhD candidate in the Department of Political Science and the Quality of Government Institute since 2014. She is currently working with the GI-ACE Director to synthesize final programme results. Her research interests include clientelism, religion, trust, and corruption in developing countries.

PROJECTS events and publications

Upcoming Events

GI-ACE researcher **Liz David-Barrett** presented some early results from **Thorsten Chmura**'s project on <u>international deal-making</u>, <u>beliefs</u>, <u>and local social norms</u> at the <u>American Political Science Association Annual Meeting</u>.

As finalists in the IMF Anti-Corruption Challenge, **Liz David-Barrett**'s research team will be attending a virtual pitch event. Read their submission and join them on October 7th here.

Is London the engine room of global corruption? Join **Tena Prelec** from the <u>testing and evidencing compliance with beneficial ownership</u> <u>checks</u> research team as she shares research insights and breaks down those enabling corruption in the West. Sign up <u>here</u> and tune in on October 7th.

In Case You Missed It

Listen to GI-ACE researcher **Stephen Berrisford** at the <u>Southern Africa City</u> <u>Studies Conference</u> as part of the <u>Cities of Integrity programme</u> that took place from August 31st to September 4th.

Researchers **Tom Mayne**, **John Heathershaw**, and **Tena Prelec** <u>shared</u> <u>findings</u> from their <u>project</u>, touching on the nexus between money laundering and the UK real estate market, at the Transparency International UK Professionals (TIPS) session on September 28th.

Publications

Schuster, Christian, Jan-Hinrik Meyer-Sahling, and Kim Sass Mikkelsen. 2020. "(Un)Principled Principals, (Un)Principled Agents: The Differential Effects of Managerial Civil Service Reforms on Corruption in Developing and OECD Countries." Governance.

Schuster, Christian, Lauren Weitzman, Kim Sass Mikkelsen, Jan-Hinrik Meyer-Sahling, Katherine Bersch, Francis Fukuyama, Patricia Paskov, Daniel Rogger, Dinsha Mistree, Kerenssa Kay. 2020. "Responding to COVID-19 Through Surveys of Public Servants." Public Administration Review.

Harris, Adam S., Rachel Sigman, Jan-Hinrik Meyer-Sahling, Kim Sass Mikkelsen, and Christian Schuster. 2020. "Oiling the Bureaucracy? Political Spending, Bureaucrats and the Resource Curse." World Development 127(3).

Dávid-Barrett, E., & Fazekas, M. 2020. <u>Anti-corruption in aid-funded procurement: Is corruption reduced or merely displaced?</u>. World Development, 132.

Buntaine, Mark & Daniels, Brigham. 2020. <u>Combining bottom-up monitoring and top-down accountability: A field experiment on managing corruption in Uganda</u>. Research and Politics.

Schuster, Christian, Javier Fuenzalida, Jan-Hinrik Meyer-Sahling, Kim Sass Mikkelsen, and Noel Titelman. 2020. Encuesta Nacional de Funcionarios en Chile: Evidencia para un servicio público más motivado, satisfecho, comprometido y ético. Report prepared for the Dirección Nacional del Servicio Civil. Santiago, Chile. 64 institutional level reports accompanied this flagship report (not available in the public domain). An interactive version of the report is available as a dashboard.

Veronica Akaezuwa, Anindita Chakraborty, Brian Chang, Shruti Manian, Aarushi Prabhakar, Shruti Sriram, Chutong Zhu. 2020. <u>Ethical Cross-Border Trading between Kenya and Uganda by Women-led Micro and Small Enterprise</u>.

THE ARCHIVES

get caught up on our blog

GI-ACE and **SOAS**

Exploring and Developing: New and effective anti-corruption interventions.

<u>Does Transparency Bring Cleanliness?</u> Offshore Financial Secrecy Reform and Corruption Control

<u>Panama and Paradise Papers</u>: Mapping politically exposed person (PEP)-linked shell companies. Daniel Haberly.

Cities of Integrity: Urban Planning and Corruption in Africa

<u>Marking Milestones</u>: Understanding the presence of corruption and the role of integrity among South African and Zambian urban planning professionals. Christian Alexander.

Ethical Border Trading between Kenya and Uganda for Small-Scale Businesses

<u>The Gendered Nature of Corruption</u>: A case study on small-scale cross border trade in Kenya. Shruti Sriram.

COVID-19 Impacts: Cross Border Traders in East Africa. Jacqueline Klopp.

Hiding the Beneficial Owner and the Proceeds of Corruption

<u>Promised Changes to Nigeria's Anti-Corruption Architecture</u>: Are they Built On Sand? Jackie Harvey.

<u>Civil Service Reform and Anti-Corruption:</u> <u>Does Ethics Training Reduce Corruption in the Civil Service?</u>

<u>Ethics Codes</u>: How they can curb corruption in public service if part of a smart anti-corruption infrastructure. Jan-Hinrik Meyer-Sahling.

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