



Strategy 2017 - 2020



**TRANSPARENCY INTERNATIONAL SPAIN
STRATEGY 2017 – 2020**

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VISION

TI's global vision is

A world in which government, politics, business, civil society and the daily lives of people are free of corruption.

We consider corruption as an endemic problem and we reject it in all its forms and manifestations as it led to poverty and social inequality, harms the environment and undermines democracy. We pursue this vision through our core values of Transparency, Accountability, Integrity, Solidarity, Social justice and Democracy. These essential values helps to build a society which respects the rights of all citizens and assumes its own responsibilities. We consider transparency as a major goal for modern society, closely linked to the *Right to know* of citizens who are increasingly demanding to be informed and to have a greater involvement in decisions that affects them.

TI-Spain vision is a society in which:

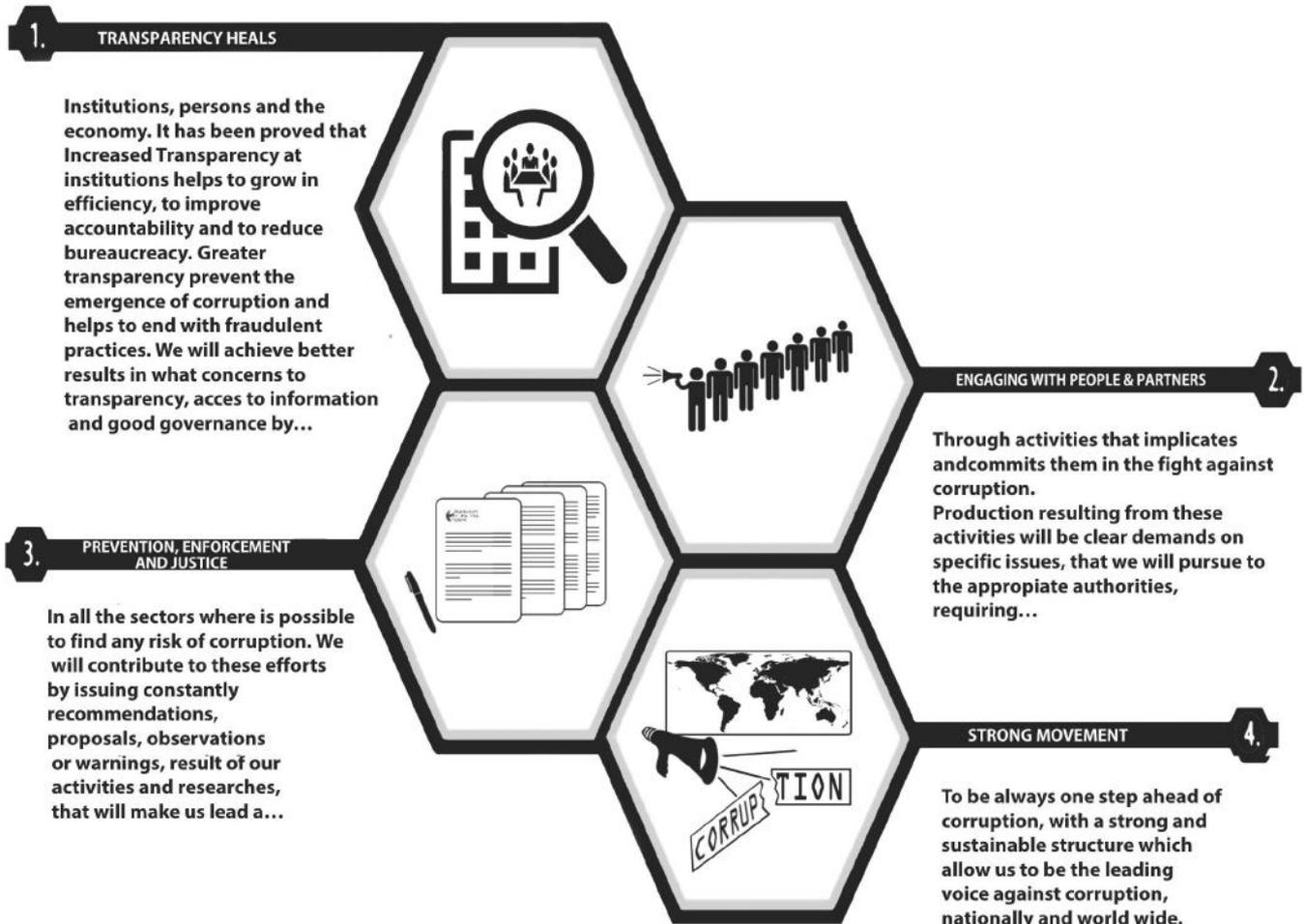
We work closely with both public and private sectors, so that:

- The citizen's trust in the integrity of those institutions which are discredited by corruption can be restored.
- Ethical behavior in the society becomes an example and the rule and not a rare exception.
- Integrity and ethical values prevails over those related with fraudulent or corrupt practices.
- Informative Transparency becomes a reality and an opportunity for citizens to actively participate in the decisions that affects them.
- The lives of the people in Spain are improved and benefited by the reduction or end of corruption.



THEORY OF CHANGE

We believe that raising people's awareness is the best way to fight corruption. We aim to build a society well informed, capable of detect, denounce and reject corruption in all its forms. We need to establish an strong and lasting bond with people, to gain its support so they help us grow as organization.



1. INTRODUCTION

Transparency International Spain (TI-E), the Spain national chapter of Transparency International (TI), fights corruption by increasing the level of information and openness that public and private institutions of Spain offers to citizenship, through actions and activities that aims to introduce an integrity culture at home and abroad, based on changing minds, attitudes and behaviors related with corruption.

TI-E was legally constituted in 2006, and is governed by the Board, composed by expert members that come from the academic and professional fields. Both activities and members are governed by the Code of Ethics of the organization and by the conflict of interest policy. From its foundation, TI-E contributed to the passing of legislation related with prevention of corruption and bribery and was requested to provide advice in major legal reforms. Also integrated or integrates, nationally and globally, a wide range of Committees, Study groups and working groups specialized in anti-corruption issues.

TI-E has also produced its own Transparency indexes in order to address the problem of deficit of public information and lack of transparency on many public institutions in Spain, proving to be, at its fourth edition, a successful way to reduce and prevent corruption in the institutions where indexes are applied.

TI-E is considered nationally as a reference in the fight against corruption and the leading civil society organization in what concerns to Transparency, Access to information, Good government and anticorruption-related issues. But we are aware that we can and must do more. In particular, we need to strengthen our structure so our actions can go even further, and to speak out loud on corruption matters that outrages public opinion in our country and internationally. We need also to connect better with the community, raising awareness about the corruption's ills and showing them how to prevent, mitigate and combat it, so they can become agents against corruption themselves.

In Spain, it has been proved that corruption have an strong presence in all possible spheres of society. The economic boom years strengthened patronage networks of corruption, in which silence and impunity were the order of the day. Nowadays, justice is responding (slowly) and the system is creating new regulations and structures to fight corruption. We, as civil society organization, need to support and accompany this effort, providing advice and proposing solutions, without forgetting to point out what is done wrong.

Additionally, in Spain, a particular situation occurs that needs to be addressed. The private sector, despite its long history of involvement in corrupt practices, is usually not punished by the society. That's why it's necessary to show that in many cases is the private company the corrupter, focusing a large part of our efforts on preventing the corruption that comes from the business sector.

With regard to the Spanish society, we consider that a greater implication is needed in what relates to transparency and corruption. Through education and active advocacy, we will ensure that the society be aware about how powerful and beneficial transparency can be for the society and, on the other hand, how harmful corruption can be.

This strategy aims to address the major challenge of fighting and preventing corruption in all the levels where it has presence.

In this context, TI-Spain considers as a consequence of our environment analysis, the next risks and opportunities:

1. The difference between political corruption (high) and the administrative corruption (low).
2. The new political environment, with new parties involved (at least formally) in the fight against corruption.
3. The clientelistic traits of certain political practices in the local (and sometimes regional) governments.
4. The development of a network of new civil society organizations involved in the fight for transparency and against corruption.
5. The new regulations (criminal, administrative, pro-transparency) in the national and regional governments.
6. The arrival of new governmental organizations and its role in the fight against corruption (how to collaborate with them)
7. The role of the new media, the new technologies...
8. The role of the big Spanish companies in the fight against corruption after the changes in our criminal law (criminal responsibility and compliance)

1.1 GOALS

Our main goals for the time period established in this strategy are:

- To achieve a significant reduction of corruption in both public and private sector in Spain, and to reduce, through a comprehensive approach, the usual forms of fraud and corruption that prevails in the society.
- To develop high quality research, up-to-date with the new and most important themes of national and international interest in the fight against corruption.
- To strengthen our structure, so we can achieve this and gain a much broader scope, specially among the civil society, and definitely constitute TI-Spain as the turn-to civil society organization for information, policy and opinion related with corruption.

1.2 OBJECTIVES

Our headline objectives for the time period established in this strategy are:

- Greater Transparency for more accountability and prevention of corruption
 - Outcome: Greater openness in public and private sectors favor accountability and prevents the emergence of corruption.
- Private sector free of corruption
 - Outcome: Private sector proofed against fraud, corruption and other illegal practices, through the improvement of their anti-corruption standards. An increasing number of companies realizes how corruption affects the economy and the society and adopts corporate compliance programmed.
- Citizens Informed and aware on corruption issues
 - Outcome: People demands justice, accountability and legislation in what concerns corruption, that leds to a better and fairer society.
- Improved Anti corruption legislation is implemented and new regulations, procedures and structures are enacted
 - Outcome: Anti corruption legislation that covers new forms of corruption is implemented, enabling corrupt activity to be better prosecuted and acting as deterrent for future corruption.
 - New legislation, new structures and procedures are enacted and created, specially whistleblower protection norms.

1.3 KEY STRATEGIES TO ACHIEVE OUR OBJECTIVES

- Side by side work with partners, public sector and private sector – In order to increase our reach and impact, we will work closely with those that can make a difference and we consider key players in the fight against corruption. Our planified activities are carefully designed to influence at all levels, so that we can
- Create informed views – Usable for all the sectors witch we address to, in the form of policy papers, concrete proposals, recommendations, and practical guidance that we will use to
- Disseminate our expertise – among individual citizens, civil society and national TI chapters, to build a better capacity to fight corruption worldwide.

1.4 STARTING TO KNOW IF WE ARE DOING WELL

Despite TIE own indexes help us measure overall progress of Transparency in Spain, we understand that all our activities, including the indexes, must have it own measure of

impact system. For that reason, we will develop, within the first year, a valid and reliable way of measuring impact of each activity.

Overall, we will establish a monitoring system based on the evaluability of the activities. Then, according the goals of the different activities included in this Plan, we will evaluate with this system the outcomes in the short, medium and long term.

To complete this measurement and to make it even more rigorous, we will be helped by the established TI indices.

1.5 OUR MISSION

Transparency International's mission is to end corruption and promote transparency, accountability and integrity at all levels and across all sectors of the society.

According to the Transparency International movement, we assume the mission to stop corruption and promote transparency, accountability and integrity at all levels and across all sectors of the Spanish society. Moreover, TI-Spain is committed to promoting social transparency increasing the level and openness of information that different Spanish public institutions generate for citizens.

According to the above *Vision* and *Mission*, TI-Spain has an STRATEGY PLAN that involves several activities. This strategy, designed for an specific timeframe that goes from the year 2017 to 2020, aims to devise TI-Spain master guidelines in three priority areas: Engaging with people and partners; Prevention, enforcement and Justice and Strong movement.

These three areas are in line with the Transparency International Strategy 2020, that serves as a road map to the ambitious goals set up collectively by our global movement.

2. ENGAGING WITH PEOPLE AND PARTNERS

Our main goal in this area is to change policies, attitudes and behaviors of the society and institutions, through the dissemination of well-informed views, policy positions, practical guidance and proactive advocacy. When possible, we will join forces and work closely with allies in the public and private sectors, civil society, individual citizens and TI national chapters.

- We aim to manage our key audiences enhancing their confidence and empowering them to be individuals agents against corruption.
- We aim to work with both a reactive and a pro-active approach, previously identifying the areas of greatest need and impact.

ACTIVITIES:

2.1. Promoting a legal regulation Protection of whistleblowers.

Objectives:

At a national level, TI-Spain aims to promote a legal regulation to protect public

and private workers, as well as citizens that are in position to report on acts and cases of fraud and corruption. Accordingly, we will support those whose work to expose corruption puts them at risk.

Activity coordinator/s:

Silvina Bacigalupo, *member of the Board*; Daniel Amoedo, Project Manager, *Staff* and David Martínez, *Staff*.

Timeline: 2017-2019

Detailed description:

In Spain, some of the most important cases of corruption are being uncovered by whistleblowers. The society starts to become aware of the need of protection of these persons that usually ends without any livelihoods after exposing corrupt practices. Transparency International Spain is demanding, along with other organizations, a law that protects the act of denouncing corrupt practices, to make sure that any person who is in position to expose corruption, can do it freely, without any threat and with guarantees of not suffering retaliation.

2.2. Platform “Participa”

Objectives:

To promote citizen’s participation and foster a greater cooperation of the civil society with TI-Spain.

With this participatory platform, TI-Spain aims to lead the national movement against corruption, promoting changes of policies and gathering people’s demands on multiple corruption-related issues. Through this Platform, we are developing innovative anti-corruption tools and approaches, like the participatory surveys, that helps us to measure the knowledge of the community about corruption and offers the chance to take an active part in all our activities and projects. Along the same line, in order to achieve influence and impact on the issues we are working on, we are preparing a large audiovisual campaign to disseminate our messages against corruption engaging the press and important figures of the Spanish society.

Activity coordinator/s:

Daniel Amoedo, Project Manager, *Staff*; Javier Hernández, Communication Manager, *Staff* and Fernando González, *Volunteer*.

Timeline: 2017-2019

Detailed description:

TI-Spain will continue use an interactive Platform to promote civil society participation and enhance the cooperation of the people with TI-Spain. This platform is a tool that will enable the society to take an active role in all the activities of TI-Spain,

fostering a culture of anti-corruption action. Among the relevant sections: a) Proposals for discussion, aiming to create a demand of accountability empowering citizens for action; promoting public opinion ensuring that it reach the ears of the rulers; b) Public consultations that allow us to know citizen's feeling about many issues related with the activities of TI-Spain; c) Active participation in TI-Spain projects; that allows citizens to participate in all the ongoing projects and activities that TI-Spain carry on; d) Suggestion box that will bring to our knowledge all the popular concerns in the fields of expertise of our organization. This platform will become an essential way of communication with the society, enhancing the relation with the organization.

This platform is called to transform the present relation between TI-Spain and the civil society, promoting citizenship participation in the activities and projects of TI-Spain and in the issues that directly affects them, increasing their involvement in decision making. Our partner in this project is the European Foundation for Information Society, which provides TI-Spain with technological support, as a result of an Agreement subscribed between both institutions.

2.3. Working with partners

Objectives:

To monitor the compliance of the transparency and anti-corruption standards of relevant institutions, and to obtain a more widespread compliance of the legal obligations and commitments of these institutions, serving as role-model for similar institutions and establishing new practices in compliance.

Activity coordinator/s:

Jesús Lizcano, *President of the Board* and Daniel Amoedo, *Project Manager, staff*.

Timeline: 2017-2019

Detailed description:

To achieve this, we will continue use the Agreements of Transparency and prevention of corruption, binding instruments by which we enforce the signatory institutions to comply with several and diverse issues connected to Transparency and the prevention of corruption. Also, these agreements give TI-Spain faculties of control over what was agreed. We ensure to select carefully the institutions with which we sign these agreements, using as main criterion the coherence with our master guidelines and research areas. We also we take into account the official character of the institutions to minimize any possible reputational risk. At present, TI-Spain is monitoring the level of compliance of various agreements signed with different official institutions, including the General Council of the Judiciary, the Attorney General and Valencia's Government.

These agreements follow a strict protocol that assures it rigorousness. Each agreement has its own monitoring procedure, as well as a Temporary Committee formed by representatives from both institutions, who is in charge of the follow up, with the obligation to report regularly about the different aspects contained in the agreement.

The TI-Spain agreements, besides guaranteeing the compliance in terms of transparency of the activity of these institutions, in some cases we are able to extend the reach beyond the obligations of the law. For instance, in the agreement signed with the General Council of the Judiciary, we were able to commit themselves to develop a comprehensive survey of the Spanish judiciary system and the role of the judges in the society. This was useful for the civil society to get a close look of the judge's work, usually unknown by the civil society.

Moreover, as a direct consequence of this agreement between the General Council of the Judiciary and TI-Spain, has been created the first database on corruption processes in Spain. This database is a comprehensive and complete map of the judicial processes currently in Spain for corruption crimes. It is a database that will be open and accessible to society, and will therefore be able to be used by all types of users, such as the media, security forces, university professors, researchers, etc. It is a good way to know the different processes and the accused and imputed by corruption, as much by types of courts, as by regions, by classes of judicial processes, by modalities of crime, by categories of judicial sentences, etc.

Another clear example of the scope we can reach with the agreements, it's the case of the one signed with Generalitat Valenciana, which was attended by the President of TI global movement, José Ugaz. Apart from the commitments in terms of transparency, we managed to get a close collaboration with the Government, resulting in a development and implementation of the Integrity Pacts in public procurement, constituting a significant milestone as it is the first time that an instrument of this kind is ever implemented in Spain. Valencia is a region which was riddled with corruption over the last years, which makes these pacts even more relevant than ever in a moment that the Spanish society is really concerned about corruption.

The agreements not only promotes and control the application of transparency measures, but includes several other necessary related with the prevention and fighting against corruption in Spain. Attention should also be drawn to the fact that TI-Chile recently signed an agreement with the Catholic Bishop's Conference of Chile following the path traced by TI-Spain.

2.4. Implementing and evaluating Corporate Integrity Policies in Spain (Siemens Integrity Project)

Objectives:

To prevent corruption and create fair market conditions in the society and in the Spanish economy.

Activity coordinator/s:

Ana Revuelta, Project Director, *dedicated staff*; Fernando González, Project Coordinator, *dedicated staff*; Eva Algaba, Assistant, *dedicated staff*; Esteban Arribas, Investigator, *dedicated staff*; César Cruz, Investigator, *dedicated staff* and David Martínez García, investigator, *dedicated staff*.

Timeline: 2017-2019

Detailed description:

This project, with a time horizon of four years (2015-2019), allows TI-Spain to enter in strategic areas of the private sector. The project aims to prevent corruption and create fair trading conditions throughout a work in three areas: a) Improvement in the enforcement of corporative ethics and legal programs in the private sector, particularly companies based in Spain from four previously identified key areas: energy, infrastructure, industry and health/pharmacy. b) Transparency and accountability in public procurement. c) Evaluation and dissemination of the Transparency, Access to public information and Good Governance Law. Clearly defined policies and researches on which we can build our advocacy will derive from these three strategic objectives.

This project is defined within the Siemens Integrity initiative, promoted by Siemens, as a part of the agreement signed with the World Bank to support projects and organizations in their fight against corruption and fraud throughout collective activities, education and training.

During the implementation of this project, TI-Spain expects to achieve an important progress in Spain in relation to the guidelines above mentioned. The beneficiary of this project is the entire society, the public institutions, and specially the spanish companies from the private sector which will be provided with tools to increase their level of transparency, integrity and compliance of the rules and legislation.

In order to ensure these lines of work and the continuity of the members that participates in this project we foresee its renewal, maintaining and updating its activities. We will be also considering our participation in other projects, so we can strengthen and consolidate our structure.

The activity *Implementing and evaluating Corporate Integrity Policies in Spain* is a project with dedicated staff funded by Siemens. Some of the persons of this special dedicated staff may be involved as volunteers in another projects/activities of TI-E.

2.5. Education and awareness raising

Objectives:

TI-Spain is developing innovative teaching materials and curricula related to transparency, anti-corruption and integrity issues, to embody the knowledge and skills deemed important for children and young people to acquire. With these materials, TI-Spain aims to develop and enhance a better targeted learning through specialized workshops. One of the best examples is the “Relational Glossary on transparency, corruption and integrity” that helps citizens to understand complex and technical terms oftenly used in anti-corruption cases and issues. Both materials and workshops contribute significantly to raise public awareness of TI and corruption.

Activity coordinator/s:

Jesús Lizcano, *President of the Board*; Fernando González, *dedicated staff of Siemens Integrity Project and volunteer for this activity* and Eva Algaba, *dedicated staff of Siemens Integrity Project and volunteer for this activity*.

Timeline: 2017-2019

Detailed description:

TI-Spain is constantly working to deliver new and innovative teaching materials and ways of explaining issues related with transparency, integrity and anticorruption, aimed at children and young people. We are convinced that sooner the knowledge is acquired, fewer will be the chances for the youth to be dragged into corruption. The system consists of theoretical and practical teaching units, as well as educational workshops aimed to acquiring or improving the social skills of children and young to identify and reject corruption in everyday situations. Both units and workshops are intended to reach many schools, helped by an agreement and with a major spanish company, which will produce for free these educational contents an will provide support with the trainers of the workshops. These activities will also help to increase public awareness of TI and corruption and to earn significant visibility among the civil society, fostering from the early years of children and youth a strong culture of anticorruption.

2.6. Revealing corruption

Objectives:

To identify cases of corruption in public contracting, and to develop a mapping of the various pending criminal cases of corruption, identifying the subjects involved and offering valuable information about the current status of the ongoing processes (in line with TI movement global effort to end impunity for Grand Corruption).

Activity coordinator/s:

Manuel Villoria, *member of the Board*; Silvina Bacigalupo *member of the Board* and Beltrán Gambier, *member of the Board*.

Timeline: 2017-2019

Detailed description:

To achieve this goal TI-Spain is performing a series of activities, in particular the development of an interactive tool to identify cases of corruption in public tenders, which is currently the major focus of political and administrative corruption in Spain; and a mapping of the multiple cases of political corruption pending in Spain, in order to offer valuable information about the current status of the ongoing processes to civil society, researchers, press or anyone interested.

Resources

Activities will be carried out by the individuals named at “Activity coordinators” section. Some of these persons are members of the Board, usually leading the activity

and working under selfless collaboration. Other personal comes from other active projects or are specially designated for the activity. In case we need to strengthen an activity based on its workload, we can hire paid staff o use volunteers, depending the collection of resources.

The activity *Implementing and evaluating Corporate Integrity Policies in Spain* is a project with dedicated staff funded by Siemens.

3. PREVENTION, ENFORCEMENT AND JUSTICE

Our goal is to establish TI-Spain as the key reference organization on anti-corruption, increasing our research quality and developing a unique approach and a distinct voice.

The definition of the key research areas is based on the principles of need, impact, and opportunities for our organization, following a process of identification, research and results.

We will foster more corruption-related research working closely with the research community through partnerships with academic and research institutions that help to fulfil our mission and objectives.

We will contribute to the academic community through providing our own expertise, through conferences, research papers, joint projects and other mechanisms.

- We aim to derive and disseminate clearly-defined policy objectives from our research on which we can build our advocacy
- We aim to use our in-house expertise capacity to generate material that in long term can achieved changes in policies, approaches and behaviors.

3.1. Take action over Grand corruption

Objectives:

We consider grand corruption as major crime necessary to be known by all the society and to be recognized by the States, guaranteeing its legal recognition and application. Several measures will be designed and implemented in order to achieve this goal.

Activity coordinator/s:

Jesús Sánchez-Lambás, *Board member* and Manuel Villoria, *Board member*.

Timeline: 2017-2019

Detailed description:

For TI-Spain is essential to strengthen ties with TI-Secretariat and other national TI chapters, so our message is delivered more strongly. In line with the effort to end

Grand Corruption, we will identify important cases of this profile in Spain and will advocate for their resolution, contributing with public institutions in raising public awareness about the prosecution and punishment of corrupt individuals or institutions.

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TI-Spain has resolved to take action in what concerns to this major crime as it defined by TI. We will began to take steps for the widespread adoption of gran corruption definition nationally and globally, encouraging advocates, scholars, lawmakers, and others to seek ways to enhance accountability of high-level public officials and others whose corruption harms their citizens egregiously and too often with impunity.

We will contribute improving and adapting this definition into national realities, with the clear target of introducing it to the national agenda and the popular language. This definition will be studied in depth in order to elaborate effective actions and measures to make this definition a reality as a major crime.

Also, TI-Spain is working progressively to mainstream the concept of Grand Corruption in all our activities.

3.2. Promoting transparency and legal regulation of Lobbies.

Objectives:

With the publication of the report: “An evaluation of Lobbying in Spain”, TI-Spain positioned as a key reference in the debate of the regulation of lobbies, revolving doors and conflict of interest at a national level. TI-Spain is pushing to achieve a legal regulation for the organized groups that influences the processes of public decision-making.

Activity coordinator/s:

Daniel Amoedo, Project Manager, *Staff* and Manuel Villoria, *member of the Board*.

Timeline: 2017-2019

3.3. Transparency Indexes of TI-Spain

Objectives:

With the aim to establish strategic presence at national level, TI-Spain is constantly developing a series of indexes that monitors and measures the level of transparency of various institutions. Among these, the one that promote good practices,

prevents and fight against *Corruption in Sport*; the one that evaluates the transparency and compliance of the GRECO recommendations by political parties; and the ones that measures the level of transparency of autonomous communities, Parliaments and Municipalities.

Activity coordinator/s:

Jesús Lizcano, *President of the Board*; Silvina Bacigalupo, *member of the Board* and Nefer Ruiz, *Expert partner*.

Timeline: 2017-2019

Detailed description:

TI-Spain is constantly evaluating and monitoring the level of compliance in terms of transparency of institutions or sectors historically linked to opacity. These rankings forces significant changes into institutions and sectors, enabling a better communication within these sectors and the citizens or improving the existent link between them. This desire for self-betterment is further spurred by competition, making them to surpass themselves, which is gain for the civil society and the country.

This benefit for the entire society is achieved with a continuous improvement and renewal of the methodology as well as the indicators that were being used during the last years to evaluate the transparency of institutions and sectors. To have the methodology and the indicators always up to date, we contacted experts from diverse spanish institutions who have an in-depth knowledge of the legal reality of Spain. Also had a decisive influence the persons from entities concerned in the development of the new legal rules of transparency in Spain, that become active agents for change. TI-Spain, in his pursuit of quality, contacted with several institutions that served as advisors in the updating of the methodology and indicators of transparency indexes, Some of them are: the Kingdom Court of Accounts, the General Audit of the State Administration, the Federation of Municipalities and Provinces, the College of Secretary, Controllers and Treasurers of the Local Administration, the Anti-Fraud Office of Cataluña and the Institute of Local Government.

Over time, these indexes become highly prestigious, obtaining recognition and respect among the public institutions of Spain. TI-Spain considers these indexes as a key activity in its active relation with institutions, and is succeeding installing a new institutional culture of transparency, which results in a greater openness and dialogue between these institutions and the civil society, specially concerning the right to access to information and public participation in public affairs and decision-making.

3.4. TI-Spain Commissions

Objectives:

To increase the impact of our work and provide us additional expertise in many areas, allowing us to lead the analysis and debate in many topics related with our work. To actively cooperates with a large number of high-quality professional representatives

of governments, private companies, research and civil society groups and organizations, fostering strong partnerships in anti-corruption related fields.

These objectives can be better achieved through the TI-Spain commissions, which are the following:

a) *Commission on Transparency and prevention of corruption in public procurement*: This Commission aims to contribute and promote the informative clarity in these proceedings, by proposing measures to prevent and hinder corruption in institutions and among representatives related to them.

b) *Commission of Legal and social proposals against corruption*: The purpose of this commission is to contribute to prevent and fight corruption by proposing plausible measures, practices and guidelines that helps to prevent this major social problem in Spain. The findings obtained helps to promote the development and implementation of regulations and standards. This activity aims for the implementation of the highest transparency, accountability and integrity standards to prevent and confront corruption.

c) *Commission on Integrity in Financial and Banking System*: This commission aims to improve the transparency and integrity in the financial and banking sector, as well to prevent corruption. The commission tries to influence this specific sector in the adoption of global standards for business integrity.

d) *Commission on Integrity and Prevention of Corruption in Sport*: This Commission aims to contribute and foster transparency and integrity at a general level in the area of sport, proposing measures that allows to prevent and hinder the illegal practices connected to corruption.

Activity coordinator/s:

Jesús Lizcano, *President of the Board*; Manuel Villoria, *member of the Board*; Elena Herrero-Beaumont, *Expert partner*; José M^a Gimeno, *Expert partner* and Nefer Ruiz, *Expert partner*.

Timeline: 2017-2019

Detailed description:

The TI-Spain Commissions are organized with the purpose of setting the national agenda on issues related with corruption. Through these commissions, TI-Spain aim to achieve strategic changes in policy and thereby accomplish an effective reduction in corruption nationally. Each commission focus on a specific priority sector or issue and combines research, advocacy and public engagement. The results of these commissions consists in recommendations, well-informed views, policy positions and practical guidance seeking to persuade people and institutions to change and apply reform measures.

a) *Commission on Transparency and prevention of corruption in public procurement*

TI-Spain is running a Commission on Transparency and prevention of corruption in public procurement in order to contribute and promote the correctness of the tender selection and the observance of legal norms in public competition, by

proposing measures and researching in new forms of preventing and hindering corruption inside institutions and among representatives related to these institutions.

The commission is made up of many and diverse representatives of institutions related to the Judiciary system, Public Prosecution, Police, Tax system, Professional Councils, Universities, Public Entities, etc. It produces high-quality researches that lead to a result of over a hundred proposals aiming to increase transparency and preventing corruption in the field of public procurement. In the coming months we will continue researching in order to understand how and where corruption takes place, on what scale, and what can be done about it. Also, we will continue working to develop more proposals and presenting them to the political Parties for approval with the clear aim to reduce risks of corruption in the field of public procurement, which moves annually billions of euros. A prove of the effectiveness and success of this commission is the inclusion of our last proposals in the electoral programmes of all the political parties.

b) Commission of Legal and social proposals against corruption

TI-Spain is running the Commission of Legal and social measures against corruption, integrated by many members representing diverse institutions such as: Anti-Corruption Prosecutor, the Centre against Organized Crime and Terrorism, judges and magistrates, the Official Council of Transparency, Universities, NGOs, etc. The purpose of this Committee is to set the agenda in the issues related through our research outputs.

TI-Spain contributes to this major problem in the country by thinking and developing new ways of fighting corruption socially and legally. This Commission is constantly producing new and effective measures and proposals, divided in four defined areas: a) Prevention of political and institutional corruption; b) Prevention of corruption within Public Administrations; c) Penalties and repression against corruption and d) Transparency and social watch against corruption.

Again, these measures and proposals are proving to be increasingly successful by the fact that most of the political Parties have included totally or partially in their electoral programmes.

c) Commission of Integrity in the Financial and Banking system

In order to contribute to the campaign “Unmask the corrupt” and to position TI-Spain as the leading voice in a sector recently criticized and rejected socially, we have created the Commission of Integrity in the Financial and Banking system. The main goal, among others, is to restore the citizen’s trust and perception in these sectors, by proposing measures related with the fields of transparency and integrity that are intended to be adopted by the Financial and Banking sectors. The measures proposed are in line to prevent and block illegal practices connected with corruption of the institutions and Companies that works in these areas and, at the same time, help to disclose the actual ownership of all accounts and financial products.

This Commission is promoting changes and improvements within the financial and banking fields throughout two main working guidelines:

A) Transparency in trading balance, as well as good practices within the financial entities: Accordingly, we are developing rules, analysis and recommendations to be

inserted in the Good Practice Codes of the financial entities, as well as principles and standards that contributes to the corporate governance of the companies, such as the setting up of anonymous complaint channels, the promotion of programs of financial Education, and the improvement of its relationship with stakeholders, among others.

B) Prevention of illegal practices that involves risks of corruption within the financial entities: Concerns the development of rules actions and recommendations that aims to fight money laundering, to find out the real ownership of every bank account and bank products, to repudiate activities in tax haven, to set up advices for the effective observance of the activity of the banks in Spain.

The Commission is composed by many members representing many different entities related to the financing and banking field as well as universities and other entities that come from both public and private sectors.

The work of this Commission is in line with the view of TI Global movement about these matters, as we take as reference the document Incentivizing Integrity in Banks, whose guidelines are being used to define incentives for integrity, to manage conflicts of interests, and to design effective measures for monitoring and accountability and transparency in these sectors.

d) Commission on Integrity and Prevention of Corruption in Sport:

The Commission is initially composed by 23 members, representatives of diverse institutions related with the sport area, justice, security forces, sports mass media, La Liga of professional soccer, investigators and university teachers.

The activities of this commission are intended to perform a effective diagnostic of the existing problems and risks in the sport area, in relation to corruption (match-fixing, doping, illegal bets, opacity and no accountability, etc.). On the other hand, the Commission will develop a series of measures for institutional and organizational changes (good practices and compliance, internal control systems, transparency measures, etc.). Moreover, the commission will do a follow-up and testing of the grade of implementation of these proposals.

3.5. Monitoring the level of legal compliance of the rules on publishing contracts by the Spanish public institutions

Objectives:

The implementation of the highest standards in terms of publishing contracts in Spain, through the active control and monitor of the compliance of the institutions involved.

Activity coordinator/s:

José M^a Gimeno, *Expert partner* and Jesús Lizcano, *President of the Board*; Marta Cano Rodríguez, *Expert partner*; Daniel Amoedo Barreiro, *Projecto Manager, staff*.

Timeline: 2017-2019

Detailed description:

TI-Spain is monitoring closely, through the development of two inquiries, the level of compliance of the rules of publishing contracts of the most important public institutions. With his activity we aim to measure to what extent these institutions comply with the law that obliges to make public all procurements and tenders in the Platform for Government Contracts, which is a digital platform to gather and publish on a centralized basis all the contracts and tenders, favoring the competitive concurrence under fairer conditions. .

As a result of the inquiries of TI-Spain, denounced publicly that three out of four of the 110 major City Councils in Spain do not comply with the law, among other findings of similar relevance. These findings constituted a meaningful impact reflected in the media, causing public statements from some of these institutions, admitting its failure and assuring that they will comply with the law from now on.

This a clear example of how close collaboration with partners could work, as this investigation is a result of the agreement signed with the Observatory of Public Procurement. This action helped to increase TI's reach and impact, shaping a national coalition against corruption that includes allies in the public and private sector, raising awareness about the harmful effects of corruption.

3.6. International Review of Transparency and Integrity

Objectives:

TI-Spain developed this specialized journal that aims to become an editorial reference in Spain and worldwide, in terms of transparency, integrity and the fight against corruption. It's also a way to disseminate the activities of TI-Spain and TI movement worldwide.

Activity coordinator/s:

Jesús Lizcano, *President of the Board*; Silvina Bacigalupo, *Board member* and Manuel Villoria, *Board member*; Sabino Ayestarán, *Expert partner*; Victoria Camps, *Expert partner*; Juan Díez-Nicolás, *Expert Partner*; Isabel Garro, *Expert Partner* and Fernando Jiménez, *Expert Partner*.

Timeline: 2017-2019

Detailed description:

This publication called "International Journal of Transparency and Integrity" aims to become an editorial reference in Spain and internationally bringing the latest advances in terms of transparency, integrity and combating corruption. The Editorial Board has a diverse composition, with members from the academy and other institutions closely related with transparency and the fight against corruption in Spain and in other countries. The magazine is electronically published on a four-month basis. Contains several sections with articles, news, interviews and coming legislation. Offers a broad

and comprehensive picture of projects and activities currently being developed in terms of transparency and integrity, both at public and private level.

The review will strengthen the role of TI-Spain as key voice concerning transparency, integrity and anti-corruption, and will be useful to spread at an international level the activities and publications of the Transparency International global.

Resources

Activities will be carried out by the individuals named at “Activity coordinators” section. Some of these persons are members of the Board, usually leading the activity and working under selfless collaboration. Other personal comes from other active projects or are specially designated for the activity. In case we need to strengthen an activity based on its workload, we can hire paid staff o use volunteers, depending the collection of resources.

4. STRONG MOVEMENT

TI-Spain, in line with the TI Global movement, is constantly innovating in order to find new ways to stop corruption. To be always one step ahead of corruption we are developing new activities and researches, and strengthening our structure with funding initiatives and highly qualified human resources.

Our goal is to serve as a point of reference in corruption issues, building a sustainable structure by investing in the professionalization of the chapter.

- We aim to support and take an active role in the Global TI, cooperating and contributing on global initiatives and assisting another chapters in their needs.
- We aim to share resources and expertise with other chapters and to work and get involved in as many projects as possible in accordance with our capacity and structure.

ACTIVITIES

4.1. *Business Integrity Forum*

Objectives:

Aims to become a reference forum at a national level in terms of prevention of corruption, legal compliance and good corporate governance. In line with TI-Secretariat guidelines, we aim to include as members companies that come from sectors at high risk of corruption, such as extractive, pharmaceutical, defense and construction. It can be an important way to increase the social impact of TI-Spain on the Spanish Private sector and on the most important companies, and will also be an important way to obtain funds for TI-Spain, consolidating its sustainable development. With the professionalization and consolidation of our BIF, TI-Spain will be at the forefront in terms

of integrity and prevention of corruption both in public and private sectors, promoting necessary regulatory reform as well as developing effective prevention systems.

Activity coordinator/s:

Silvina Bacigalupo, *Board member*; Daniel Amoedo, Project Manager, *staff* and David Martínez, *staff*.

Timeline: Starting in 2017, with the intent to be established as the main funding activity of TIE.

Detailed description:

In order to raise anti-corruption standards in Spain-based companies, TI-Spain is developing the Business Integrity Forum, using the Business Integrity Programme developed by TI-UK as reference. Animated by the good results and the high level of acceptance of the UK Programme, we considered necessary to replicate the experience here in Spain. With the creation of the Forum, we expect that the national based companies will improve their own performance in terms of anti-corruption and legal and ethical compliance. We aim to be the leading voice on private sector corruption matters, and a resource and assessment center in Spain. We will focus not only in bribery but in others key aspects of private sector corruption that we identified as needs of the business community in Spain.

We have been carrying out a detailed investigation about how to implement the Forum in the best way possible. In this line, we have been in contact with the persons responsible of the similar programme in the UK. TI-Spain is fully convinced that this Forum will generate funds to provide most of the funding available for TI-Spain other activities. We have already proved the acceptance of this initiative, as currently we are running the forum in an unpaid version, achieving the accession of more than over 20 members, most of them listed companies.

We expect a great acceptance converting the current Forum into a paid version, as we were able to retain the actual members loyalty with the proven usefulness and success of the unpaid version of the Forum.

Resources

At present, the BIF is working under the selfless collaboration of the members of the Board and personal that comes from other active projects. As soon as we collect sufficient resources, we will hire a full-time Director and a Project Officer. We are fully convinced that the Forum will generate surplus funds that will provide most of the unrestricted funding available for TI-Spain's other activities. We are projecting to have at first 15 BIF members (currently 22 in the unpaid version).

5. OTHER ACTIVITIES

5.1. TI-Newsletter

Objectives:

TI-Spain is publishing since October 2015 a Newsletter on a weekly basis to keep updated our audience with news and events related with the transparency movement worldwide. We keep track of all the ongoing TI movement activities, as well as all the significant changes in terms of transparency and fighting against corruption.

Activity coordinator/s:

Javier Hernández, Communication Manager, *Staff*.

Timeline: 2017-2019

Detailed description:

TI-Spain is publishing since October 2015 a Newsletter on a weekly basis to keep up our audience with updated news and events related with the transparency movement worldwide. We keep track of all the ongoing TI movement activities, as well as all the significant changes in terms of transparency and fighting against corruption. This Newsletter is published on TI-Spain website and mail to subscribers. The newsletter is increasing the visibility and social involvement of TI-Spain.

6. FUNDING THE PLAN

Objectives:

To ensure the financial independence and sustainability of TI-Spain, Ensuring no political, commercial or financial sector interference in the organisation, through some ways to obtain funds (partners, members, public and international open calls and specially the Business Integrity Forum).

Persons in charge:

Jesús Lizcano, *President of the Board*; Silvina Bacigalupo, *Board member*; Daniel Amoedo, Project Manager, *Staff* and David Martínez, *Staff*.

Timeline: 2017-2019

Detailed description:

A) Institutionalization of the “Foro Integridad” (Business Integrity Forum) as a mechanism of collecting financial resources for TI-Spain, focusing particularly on the private sector and foundations, and called to become the main source of income to TI-Spain.

- The Forum will be conducted in line with TI’s values and mission, and there will be an economic benefit to TI-Spain for running this initiative.

- The Forum will make a proportionate contribution to the charity's administrative and management costs.
- The Forum will operate in a coordinated manner with the other activities in the chapter, and synergies are gained to the benefit of the chapter as a whole.
- BIF will suppose an active dialogue and exchange with the private sector

Among all the possible alternatives of collecting financial resources in a short or medium term, the BIF stands as the more feasible to be implemented in short-term basis, due to its considerable long path followed (5 meetings held since its creation) and the consolidated group of companies, public and private entities and other organizations.

An comprehensive study of the different chapters of the TI movement, showed us that there is no consistency on the establishment of membership fees. Therefore, the amount of the membership is established according to the situation in each country where BIF is implemented.

To stipulate an amount according to the situation in Spain, we took into account the amounts that were established in the past fundraising experiences of TI-Spain, as well as the membership fees that the other TI chapters established for their own BIF's. Also, we have collected all relevant information regarding similar experiences at national level, concluding that is important to establish different fees according to the size of the participating companies.

We consider, therefore, that an appropriate amount to be established as an annual fee, could be 4.500 euros for listed companies, and 2.000 euros for small and medium-sized companies.

Our BIF, as it is currently running, its composed by 22 corporative members (all of them listed companies) and 5 observers (including authorities established under public law, organizations of the civil society and sectorial business associations).

Once established as an independent initiative, and fees are set, the BIF will be extended in members and sectors, opening us the doors to a larger quantity of potentially contributing members.

The investment returns or benefits of belonging to the BIF remain to be determined, although we can chart or project the most viable benefits we might offer taking into account our structure and expertise. We will provide training and advisory services for companies that meet our criteria; thereby helping them improve their anti-corruption efforts and further developing our own thinking and expertise.

Another issue of significant relevance not yet defined, are the rights and duties that the contributors will acquire according to its contribution. In principle, we are considering to establish strict membership principles, and review the affiliation of the companies that appear to have breached these principles. Also, we will maintain a philosophy of not turning anyone away who wants to join and meets our criteria.

B) Fundraising proposal of the Business Integrity Forum

In view of the above, the potential incomes that might be generated from the professionalization of the BIF as one of the major activities of TI-Spain regarding fundraising, we have developed the following framework of annual income forecast.

The framework is useful to offer an rough idea of the possible incomes that might be generated during the first three years of operation of the BIF.

A clarification is needed that the amounts indicated are estimated and its collection depends on several factors, such as the economic situation of the country and the companies, or the success in implementing the strategy.

Resources: At present, the BIF is working under the selfless collaboration of the members of the Board and personal that comes from other active projects. As son as we collect sufficient resources, we will hire a full-time Director and a Project Officer. We are fully convinced that the Forum will generate surplus funds that will provide most of the unrestricted funding available for TI-Spain´s other activities. We are projecting to have at first 15 BIF members (currently 22 in the unpaid version).

| YEAR 1 (2017) | | | | |
|--|---------------------|----------------|-----------------|----------------------------------|
| TYPE OF COMPANIES | NUMBER OF COMPANIES | PRICE PER UNIT | AMOUNT | OBSERVATIONS |
| LISTED COMPANIES | 10 | 4.500 € | 45.000 € | 22 companies in the actual BIF.* |
| NON-LISTED COMPANIES (SMALL AND MEDIUM SIZE) | 5 | 2.000 € | 10.000 € | |
| TOTAL | 15 | | 65.000 € | |

| YEAR 2 (2018) | | | | |
|--|---------------------|----------------|-----------------|--------------|
| TYPE OF COMPANIES | NUMBER OF COMPANIES | PRICE PER UNIT | AMOUNT | OBSERVATIONS |
| LISTED COMPANIES | 15 | 4.500 € | 67.250 € | |
| NON-LISTED COMPANIES (SMALL AND MEDIUM SIZE) | 10 | 2.000 € | 20.000 € | |
| TOTAL | 25 | | 87.250 € | |

| YEAR 3 (2019) | | | | |
|---------------------|---------------------|----------------|------------------|--------------|
| TYPE OF COMPANIES | NUMBER OF COMPANIES | PRICE PER UNIT | AMOUNT | OBSERVATIONS |
| BASIC MEMBERSHIP | 22 | 4.500 € | 99.000 € | |
| ADVANCED MEMBERSHIP | 20 | 2.000 € | 40.000 € | |
| TOTAL | 42 | | 139.000 € | |

***We consider that initially the BIF will count with more listed companies as it currently consists of this type of companies.**

C) Alternative ways of fundraising: members, partners and public and international open calls.

Alternative fundraising will be also explored to support our structure: through the donations of individuals members, selfless contributions from private companies and application to public and international open calls.

Relating the individual donations, we will strengthen our bond with people through our activities so they can know our work, recognize and value it and financially support our structure.

In what concerns to the selfless contributions from private enterprises, we will continue implementing a form of funding that consists in signing private partnership contracts with companies concerned about corruption and transparency. This partnership contracts, among other benefits, allows the signatory companies to attend all the TI-E events as special guests, and to receive in both paper and electronic format, all our reports, reviews and position papers.

Finally, we are considering the possibility of applying to public and international open calls relating issues of Transparency, corruption and whistleblowing in order to finance our structure. We are also analyzing the possibility to join forces with another organizations to apply together to a wider range of international projects and open calls.