



READY FOR ACTION

**CiFAR STRATEGY
2024-2027**



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FORWARD

1 December 2023

The development of our 2024-2027 strategy comes at an exciting time for CiFAR. Our role and situation have changed substantially since the beginning of our last strategy. Between 2020 and 2023, we focused primarily on networking civic actors and supporting the capacity of CSOs and journalists to engage with asset recovery. While continuing with this work, we have shifted towards more direct engagement in policy discussions and advocacy for reform over the past four years. This has enabled us to advance the global, regional and national agendas around topics essential to accountable, transparent and participatory asset recovery, including asset management, return mechanisms and confiscation tools. This has built on collective action with our partners and high-quality research.

We have also physically expanded in terms of people and locations. Several new staff members have joined since the inception of our last strategy and we have set up stronger governance structures, with our first international board constituted under the last strategy and continuing to provide expert guidance and oversight into the new one. We further established our second CiFAR office – in Nairobi – as a sign of our commitment to supporting asset recovery globally.

The asset recovery field has also seen several positive developments. Compared to the start of our last strategy and, looking back, to CiFAR's founding, there are more civil society actors engaged in asset recovery and making strong contributions to international and national returns. There are also many more cases and transparency around those cases has improved immeasurably. Civil society is also now leading the way, with forward looking policies and research driving the debate rather than solely reacting to the uncovering of new cases. At the same time, grand corruption is still taking place, important loopholes allowing the corrupt to hide their wealth overseas are not being closed fast enough, and destinations for that wealth are shifting to less cooperative jurisdictions.

We are then at a time of exciting developments, with still a lot to do. With our new 2024 – 2027 strategy, we're ready to take on those developments and work collectively for accountable, transparent and participatory asset recovery worldwide.

The CiFAR Board

BACKGROUND AND CHALLENGES

Civil society is stronger but threatened

Over the past four years and into 2024 many more civil society organisations (CSOs) have become engaged and strengthened their work on asset recovery. This work has moved from a largely case- or national-based approach to asset recovery present in 2020, to greater engagement at the regional and global levels, taking lessons from the national level to worldwide debates. It has also seen more involvement of human and victims' rights- and development-focused CSOs in asset recovery as the links between corruption and the protection of rights have been more clearly articulated.

As in previous years, journalists in 2024 are still at the forefront of exposing corruption and in shedding light on government action and inaction to investigate, prosecute and ultimately return stolen assets. Cross-border collaboration has been a hallmark of this work, with individual and groups of investigative journalists working on cases crossing the world and mirroring the networks used by corrupt actors to hide illicitly acquired wealth.

CiFAR has been keenly involved in this work since our founding, providing support to CSOs to work on asset recovery, training journalists, and building and strengthening networks amongst and between both groups. While not alone in this, collectively this has put us all in a much stronger position than 2020.

Nevertheless, space for civil society actors is under threat. CSOs in some countries are facing more difficult operating environments, while in others ongoing hostility makes working on highly sensitive topics like asset recovery a dangerous topic. As CIVICUS has reported, only 3.2%

of the world's population lives in a country with fully open civic space and several of the countries we work on have obstructed or repressed space for civil society to operate. We have directly worked to counter restrictive practices in Angola, and we foresee further work to press for more civil society space alongside our work on asset recovery in the coming years. This is perhaps even more so the case for investigative journalists, with journalists under attack in many countries in the world and particularly for writing on topics close to our work, including corruption and human rights violations. Supporting journalists to do their work and to do it in safety will therefore remain a priority for us.

Related to this has been the growth in the use of strategic lawsuits against public participation (SLAPPs) – “legal actions typically brought by corporations or individuals with the intention of harassing, intimidating and financially or psychologically exhausting opponents via improper use of the legal system” - which pose a threat to our direct work. Often used by powerful persons, particularly oligarchs through defamation suits, SLAPPs represent a threat to our ability to freely engage in discussions relevant to asset recovery and is an area where we will engage in together with partners in the coming years.

Asset recovery cases are growing in number and the national level is becoming more important

Alongside growing civil society engagement in asset recovery, the past four years have seen a growth in asset recovery cases. Major returns ongoing or planned as of 2024 include Equatorial Guinea, Kenya, Nigeria, Uzbekistan and Venezuela, while investigations are underway with a view to confiscation and return to Angola

and Mozambique, amongst others. Other cases, such as those relating to Moldova, Tunisia and Yemen have, however, stalled internationally. Aside from this, there are major bribery cases that will involve international returns, including the Glencore cases.

Going into our new strategy will therefore see us engaged in more cases than ever before and approaching cases in a variety of ways. For those where a return has started or is imminent, we will focus on engaging with and monitoring the return, for those that are under investigation, our focus will be on ensuring that investigations continue and lead to efforts to confiscate and recover assets, while for those that have stalled, we will work to reactivate the cases and draw out lessons as to why they have not progressed.

In the past four years there has been an increase in focus on domestic recoveries. While of a different legal character than international returns, these cases nevertheless include many of the same opportunities and challenges seen in cross-border recoveries. This includes around asset management pre- and post-confiscation, transparency and participation in the process, and the compensation of victims, victims' groups and communities affected by corruption. New tools developed to speed up international cases can also work on the national level and international modalities for return can have domestic application.

The asset recovery environment is changing rapidly

Since 2020 we have seen extensive legal and institutional developments worldwide to address asset recovery more effectively. This has included the expansion of Magnitsky style anti-corruption sanctions to many new jurisdictions, the increased use of civil proceedings to confiscate

assets, the introduction of further rules on illicit enrichment and the expansion of institutional structures responsible for returning stolen assets. It has also seen greater information provided by governments on asset recovery and the establishment of some structures to better include civil society and victims in the process.

These legal and policy developments have however not taken place everywhere to the same degree and many countries, including those frequently engaged in asset recovery, still only provide limited information on cases, policies and actions taken to recover the proceeds of corruption. New tools for asset recovery have additionally faced challenges and gaps exist in learning from these tools and understanding how they could work in other contexts.

The asset recovery environment more broadly has moreover seen the rise of new jurisdictions as key centres for global illicit finance and as destinations for stolen assets. With increased action to investigate and return illicit wealth in Europe and North America, and growing pressure on traditional tax havens, new countries have risen in popularity as conduits and places to store corrupt wealth. Engaging with these new jurisdictions will be key in the coming years.

OUR VISION AND MISSION

CiFAR's **vision** is a world where public officials are unable to steal public money or otherwise illicitly profit from their position and hide it at home or overseas.

Our **mission** is to end these practices through participatory, transparent and accountable asset recovery.

We employ a broad understanding of the term asset recovery. For us asset recovery includes the entire asset recovery process, from identification of possible crimes, through prosecution, adjudication, management, return and modalities for that return of assets, and reuse.

While asset recovery often relates to the proceeds of different kinds of crimes, especially within illicit financial flows, our strategic priority remains working on the recovery of assets stolen through corruption in the public sector. Equally, our priority remains working on the recovery of assets at both the domestic and international levels, as well as on civil and criminal proceedings.



Our theory of change is built on the premise that corruption in politics can only be ended through asset recovery acting as a response, deterrent and method for building greater integrity. Asset recovery can only play this role if it is carried out robustly and in a manner that is participatory, transparent and accountable. Several conditions need to be in place for that to happen. These are not necessarily sequential steps and are not all interdependent. Nevertheless, only by advancing on each of the steps will we be able to advance towards our vision.

KEY RESULTS OF OUR 2020 - 2023 STRATEGY

Our Strategy 2020-2023 was the second strategy developed for the organisation and reflected the changes that had taken place from our founding in 2016 to our place as a young civil society actor still solidifying its place internally and externally. It focussed on continuing efforts to expand the actors engaged in asset recovery, as well as pushing forward evidence-based global debates on how asset recovery functions. It also explicitly focused on CiFAR's own growth and development as an organisation.

It was organised over three results areas. The first – Global Priorities – aimed to improve civil society's understanding of how asset recovery functions, explore new and under-considered options for the recovery of stolen assets, and work with civil society to advocate for their adoption. The second – Strengthening Civil Society – aimed to continue improving the capacity of non-state actors to work across borders on asset recovery, both on cases and as a tool for broader societal reform. The third – CiFAR as a strong actor – looked internally and aimed to strengthen our organisation, focussing on our capacity to be an expert, agile actor able to engage sustainably on the issue and to respond to the needs of others working on cases on the ground.

The past four years saw us largely achieve the goals of our strategy and enabled us to position ourselves as both a strong actor in our own right and as a hub on asset recovery for a wide range of strengthened civil society actors.

Priority Area 1: New tools for asset recovery

Our work in this area aimed to develop a better understanding of non-traditional tools for asset recovery, their prevalence and effectivity in combatting cross-border corruption, facilitating asset recovery and contributing to systemic change in both countries of origin and financial centres. Within this area, we developed new research into asset recovery and assessed new tools that were being developed at the national level. This included looking at reconciliation agreements, unexplained wealth orders, and sanctions as a tool for asset recovery. It also included looking at new and comparative ways to manage assets, both pre- and post- confiscation and engaging with discussions on all these topics at the national level. For all these topics, it also included making recommendations for how these new tools could be implemented in a way that contributes to participation, transparency and accountability.



Sanctions Watch webplatform

Priority Area 2: Returning assets to hostile environments

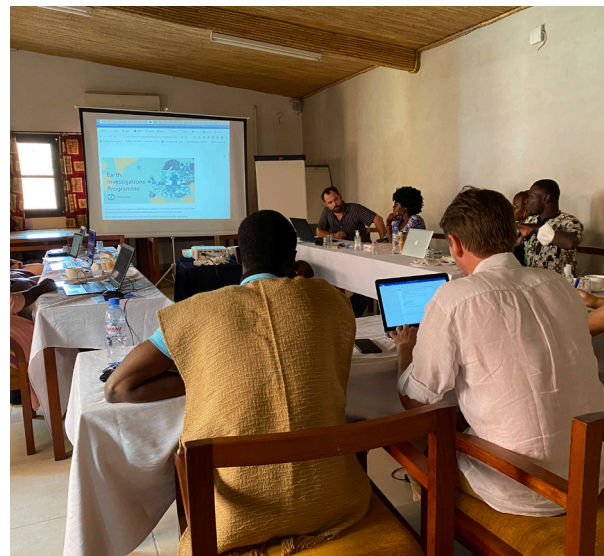
Our work in this area aimed to support civil society work around international returns to jurisdictions where corrupt regimes are still in power or where there is little to no possibility of citizen oversight of returned assets. In the past four years our focus has been on supporting CSO coalitions, including working on the Equatorial Guinea, Venezuela and Uzbekistan cases with several organisations, and on developing thinking around returns. This has included the publication of research papers on victims and asset recovery and on indirect international returns, as well as holding events on those topics at UN conferences.

Priority Area 3: Asset recovery as law

Our priority in this area was to work with our partner organisations to evaluate, design and advocate for strong laws that both prevent public asset theft and ensure transparent and accountable returns. It also aimed to lead and support investigations by journalists and CSOs into compliance with existing laws, including in particular sanctions. Within this area, we supported national level legal reform, particularly in Angola, Kenya and Mozambique. We also contributed alone and with partners into regional level reforms, developing and beginning piloting of a tool to assess implementation of the Common African Position on Asset Recovery (CAPAR) and feeding into European Union asset recovery and sanction reform proposals. Our investigations also focussed on sanctions enforcement, with our Russian Escape Investigations in July 2023 demonstrating weaknesses in oversight of sanctions across several European jurisdictions. A major event was the Global South Forum which took place in Nairobi, Kenya in 2022 and saw 30 participants, representing 25 civil society organisations meet to plan collective work on asset recovery reforms.

Priority Area 4: Making asset recovery more visible

Our priority in this area focussed on identifying and publicising more information on asset recovery cases in a way that is accessible for everyone. To do this, we published over the course of four years more than 50 blogs detailing cases, linking issues, and explaining asset recovery. We also developed and launched the global Sanctions Watch website, bringing together all persons sanctioned for corruption across several national regimes. We published country profiles, detailing cases and the asset recovery framework in several jurisdictions, updating them regularly, and published articles in the media on asset recovery. We also developed a specific guide to asset recovery in Kenya, designed to be a tool to explain asset recovery for citizens not specialised in the topic.



Investigate West Africa Training

Priority Area 5: Capacity building and strategizing

Our 2020-2023 priority in this area was to carry out capacity building for civil society organisations that needed it, continuing to train investigative journalists to work on asset recovery, and supporting cross-border strategizing, advocacy and campaigns on cases and on our Global Priorities. This was a major focus of our work throughout the previous strategy. We led CSO trainings in Angola, Kenya, Mexico, Moldova and Mozambique on both asset recovery generally and specifically on sanctions. We provided strategic advice and support to national and regional advocacy across those countries and to partners in those country, as well as in Sri Lanka, Tunisia and Ukraine. We also provided training and mentoring to over 120 journalists across East Africa, Madagascar, West Africa, the Western Balkans and Western Europe. Out of some of this work, we developed CSO Principles, initially on accountable asset return and then later on asset management, victims and anti-corruption sanctions, submitting the former as a collective to the UN General Assembly Special Session on Corruption.

Priority Area 6: Networking and inclusion

Our priority under this area was to continue our work to convene civil society across borders on asset recovery, including through supporting civil society actors to build their networks through meetings and events and through expanding our databases of engaged actors and individuals. We focussed particularly on supporting civil society from the countries of origin and empowering their voices at the global level. As part of our work under this area, we supported civil society to work together across borders, facilitating discussions on topics from return mechanisms to sanctions. Major accomplishments included organising the first Global South Forum on Asset Recovery, bringing together 30 CSO representatives in 2022 to discuss priorities for asset recovery collective work, co-chairing the UNCAC Coalition Asset Recovery Working Group and networking civil society together in advance of the CoSP 10, and setting up and providing secretarial support to the CAPAR CSO Network and Sanctions Working Group.



Global South Asset Recovery Forum, Nairobi

Priority Area 7: Structures

Under this area, our goal was to carry out a review of our internal governance system, focussing on the roles of the Board and Advisory Board, with a view to increasing independence and accountability within the structures of CiFAR and in our interactions with the outside world. We also sought to make as many of our processes and procedures as public as possible, as well as our funding, to continue to ensure that we are as transparent ourselves as we demand from others. We developed a new governance structure during our 2020-2023 strategy, using this as the basis to establish a new International Board with greater oversight over the functioning and direction of CiFAR. We also further developed our internal and external policies, regularly publishing information on our donors, alongside our annual financial and narrative reports.

Priority Area 8: Visibility and funding

Our priority under this area was to ensure that we grew sustainably through building our base of donors and increasing our funding levels to be able to cover all our work areas effectively, including by increasing our staffing capacity and seeking longer-term and non-project-based funding. We also planned to work to improve our visibility through developing our communications strategy, with a focus on reaching relevant audiences with our messages and on being seen more often as a focal point for our area of expertise. Throughout the last four years, we saw our funding and donor base expand, leading to increased staffing covering more areas of importance for our partners. It also saw us develop a communication strategy and work to implement it, as well as expanding our networks and contacts more broadly, enabling more targeted communication.

OUR 2024 – 2027 STRATEGY

OVERVIEW

CiFAR's strategy for the coming four years covers four results areas, each with specific areas of work. Within each of these areas, we set out the aims we seek to achieve. In breaking it down in this way, we aim to be as clear as possible in identifying what we seek to achieve over the coming four years at a strategic level.

- » **Results Area 1 - Setting Standards** seeks to establish the foundation for our work internationally, regionally and nationally. It encompasses work to develop and set principles and policies that will make asset recovery more transparent, accountable and participatory. Our work here will build on our existing experience and focus on the link between asset recovery, and various processes, tools and modalities closely connected to it, including illicit financial flows, asset management, sanctions, social reuse, victims, and enablers of grand corruption.
- » **Results Area 2 - Implementing reforms** will see us engaging globally, regionally and nationally to advocate for the implementation of best practice and international standards around asset recovery. As part of this, we will promote ongoing reforms and support to CSOs to advocate and campaign for these reforms. A particular focus at the regional level will aim to support the gains made in Africa and Europe over the past four years around asset recovery.
- » **Results Area 3 - Advancing transparency** encompasses both CiFAR-led investigations, data gathering and publishing, and support to investigative journalists and CSOs to undertake investigations and provide information on asset recovery. It will see us both continuing to support journalists to investigate asset theft and financial crime more broadly, as well as to develop the skills of our partners to do so. It will also see us working to make the asset recovery process more transparent, through collecting and publishing information on agreements, cases and return modalities.
- » **Results Area 4 - Networks for change** includes work with and support to thematic and case-based CSO networks. It also includes the holding of global and regional meetings of CSOs, building on our Global CSO Asset Recovery Forum in 2022, and strengthening CiFAR as a hub for asset recovery.

These results areas are designed to work together and should not be seen in isolation. Activities undertaken in Results Area 1 both inform the global debate and feed into the work we are doing to advocate for adoption of standards nationally, regionally and internationally in Results Area 2, for example. So too is work in Results Areas 1 and 2 informed by the information we uncover in Results Area 3 and all are underpinned by strengthening networks in Results Area 4. In other words, while divided into areas to help us focus our work, this strategy is holistic and all parts need to be supported and engaged with for us to achieve our goals.

As part of our strategy and given the rapid developments that have taken place in asset recovery in recent years, we will plan a mid-term review of the strategy with our international board and key stakeholders in January 2026. This review will provide us with the opportunity to reflect on how well our priorities fit within current realities and allow us to course change should alterations to the current strategy be needed.

PRIORITY COUNTRIES FOR NATIONAL LEVEL ENGAGEMENT

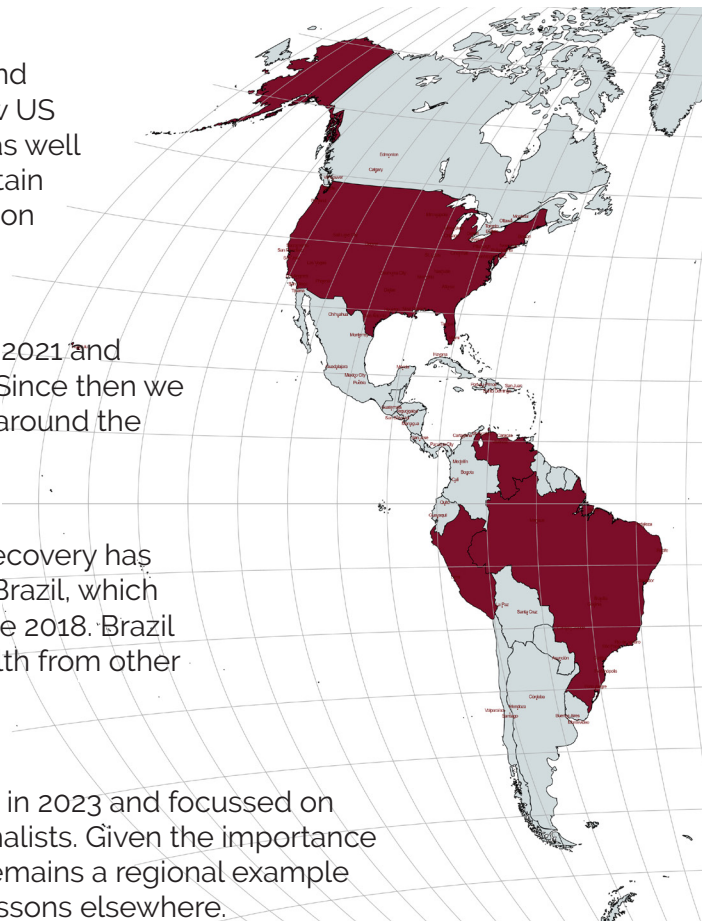
Unlike in previous strategies, our national level work under the 2024-2027 has a focus on several priority countries and regions. While we will continue to work on and support civil society in new cases as they arise and in specific engagements where we already have commitments, as well as continuing to engage on the global level, our decision to prioritise certain jurisdictions in this strategy reflects our belief that this will enable us to provide more substantive support by having a narrower focus. These focus jurisdictions are also countries where we have a longer engagement and where we can build on our work at the national level as regional and global examples.

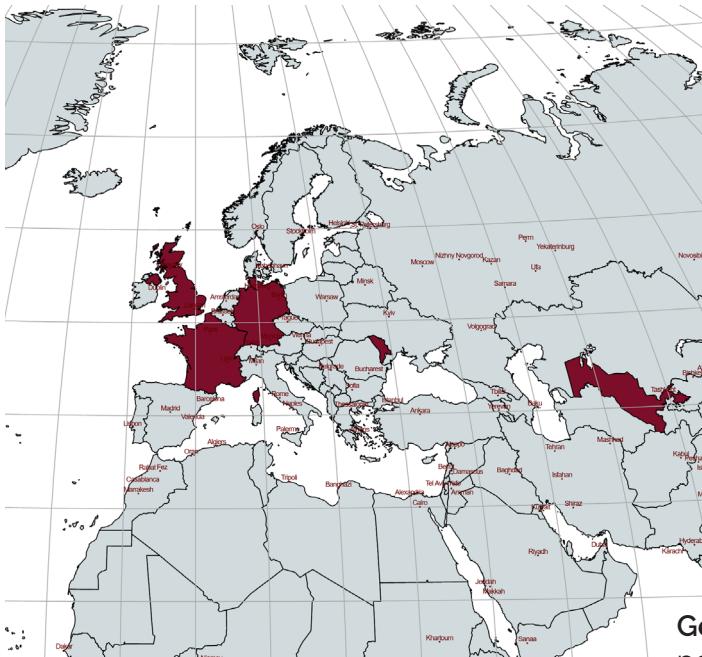
United States: Working with partners and authorities, we aim to continue to follow US developments around asset recovery, as well as to engage in ongoing cases and sustain momentum around global anti-corruption efforts.

Venezuela: Our work on Venezuela began in 2021 and focussed initially on supporting civil society. Since then we have worked with our partners on advocacy around the upcoming asset return mechanism.

Brazil: Following the Lava Jato case, asset recovery has become a political, and politicised, issue in Brazil, which we have been working on with partners since 2018. Brazil is also a destination for illicitly acquired wealth from other priority countries.

Peru: Our work in Peru began in 2023 and focussed on supporting investigative journalists. Given the importance of asset recovery to Peru, it remains a regional example that can provide important lessons elsewhere.





Uzbekistan: The Karimova case has been an area of importance in our work since 2017. Working with partners, we have followed developments that led to the establishment of a UN trust fund in 2022.

Moldova: The Billion Dollar Bank Fraud case rocked Moldova and led to strong political commitment to address corruption. Efforts to recover the money have however stalled. CiFAR has been actively supporting Moldovan civil society to keep reforms and the case on the agenda in Moldova and Europe more broadly since 2017.

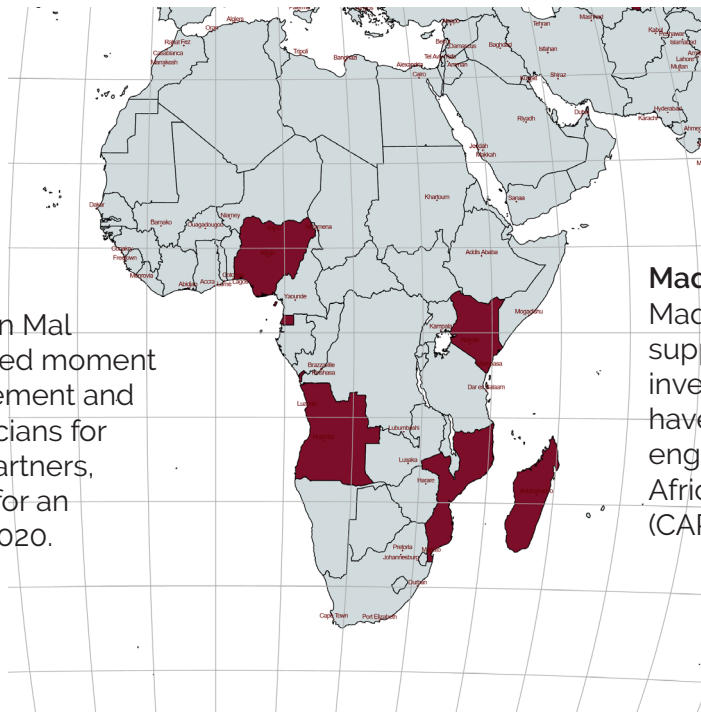
United Kingdom: Having spearheaded the publication of information around asset recovery, as well as the 2019 Asset recovery action plan, we will work with partners and authorities on ongoing cases, as well as to increase transparency in the asset recovery process.

Germany: While asset recovery has not been a major political topic in Germany, since the imposition of Russian sanctions there have been developments in how Germany is responding to illicit finance. We will continue to work with partners and authorities to tighten up loopholes that see Germany as a conduit for illicit financial flows.

France: As a major destination state for stolen assets, France will continue to be a priority for us. Working with partners, we will work on ongoing cases involving France, as well as particularly engaging with relevant authorities on return mechanisms and the role of victims in asset recovery.

Nigeria: The Abacha returns has seen Nigeria, and Nigerian civil society, world leaders in asset recovery. Our work in Nigeria began in 2018 and has focussed on supporting civil society and bringing lessons learnt from Nigeria to global audiences.

Kenya: There has been strong commitment in Kenya to strengthen domestic and international asset recovery in recent years. Since 2018 CiFAR has engaged with civil society in Kenya, opening an office in 2020 and registering as a Kenyan organisation in 2023.



Equatorial Guinea: The Bien Mal Acquis case was a watershed moment in both civil society engagement and in prosecuting sitting politicians for corruption. Working with partners, we have been advocating for an accountable return since 2020.

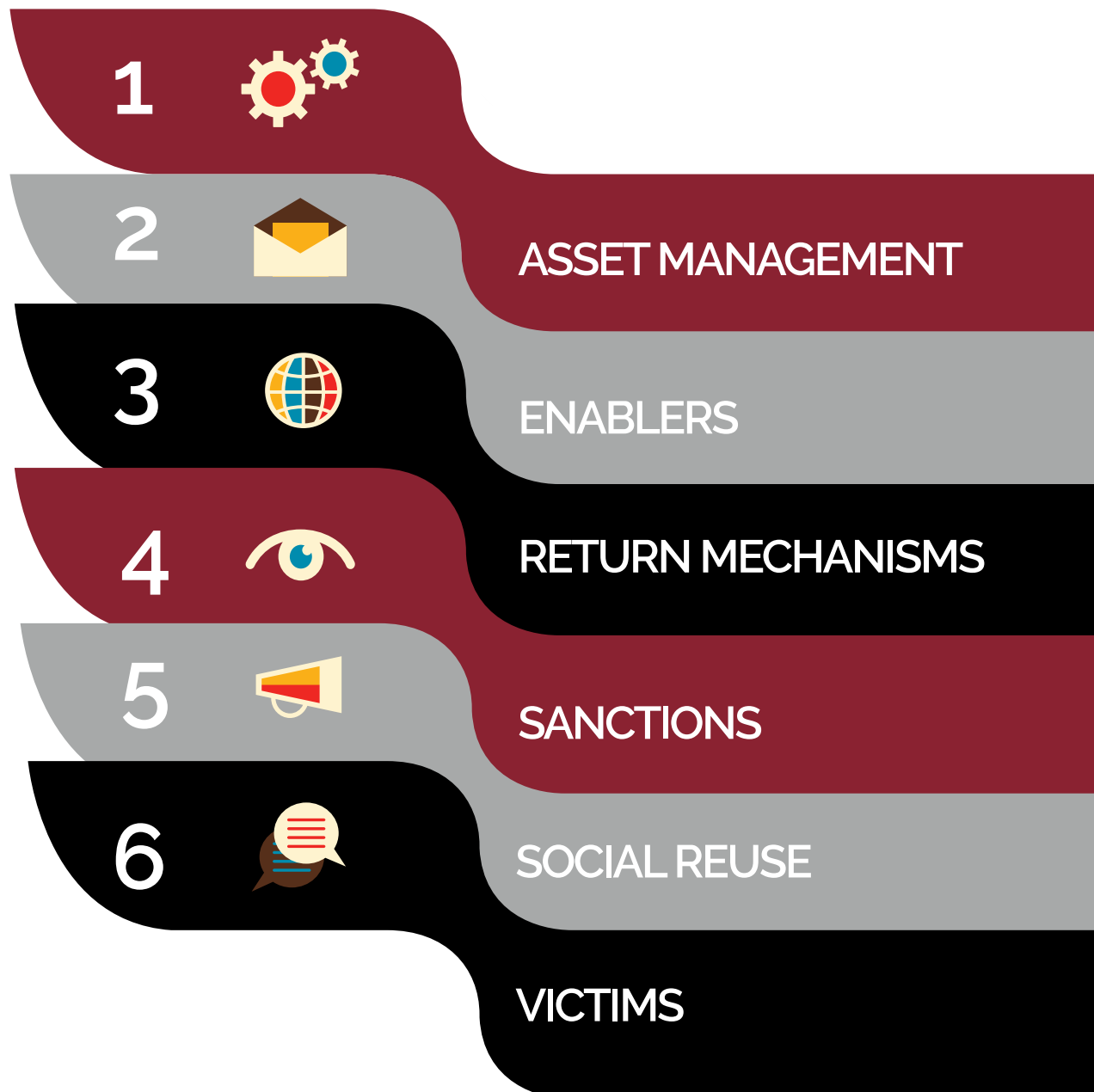
Madagascar: Our work in Madagascar began in 2022, supporting journalists to investigate financial crime. We have since then worked to support engagement in the Common African Position on Asset Recovery (CAPAR).

Angola: Angola has been an important country for our work since 2018, when we began engaging with partners on the Dos Santos case and ongoing reforms related to asset recovery in Angola.

Mozambique: We have been working with partners on the Hidden Debt case since 2018, which had led to substantive domestic reforms to address corruption and facilitate asset recovery

FOCUS THEMES

Running through the work that we will do are several thematic areas. While we will remain responsive to developments and to specific national, regional and international needs, our focus in the next strategy will be particularly on advancing the agenda around several topics:



RESULTS AREAS

RESULTS AREA 1: SETTING STANDARDS

This results area aims at developing and promoting international and regional level standards and CSO-led principles with the goal of making asset recovery more accountable, transparent and participatory.

1.A - MOVING FROM ANTI-CORRUPTION SANCTIONS TO ASSET RECOVERY

Since 2019, CiFAR has been looking at the conditions for developing robust and transparent anti-corruption sanctions regimes, providing civil society and stakeholders with sanctions analysis and advocating for increased data accessibility. We looked particularly at the EU misappropriation regime on Tunisia, Egypt and Ukraine and launched a first publicly available platform, Sanctions Watch, listing and describing anti-corruption sanctions worldwide.

The past decade has seen the rapid increase in the use of anti-corruption sanctions as a tool to prevent persons suspected of corruption from accessing their wealth overseas. From the initial development in the US of the Global Magnitsky Act, several countries have introduced ways to freeze the assets of suspected kleptocrats.

What has been missing and which may be on the cusp of change, is the relationship between anti-corruption sanctions and investigations into the origins of those assets. Historically treated as two separate processes, the introduction of task forces and institutional policies following the 2022-2023 Russian sanctions has begun to see movement towards creating a linkage between the imposition of sanctions and the opening of investigations into the source of sanctioned wealth in the sanctioning jurisdiction.

Our work in this area aims to build on these developments and has the purpose of driving the global debate towards institutionalising the link between anti-corruption sanctions and anti-corruption investigations.

i. STANDARDS, POLICIES, PRINCIPLES ON THE RELATIONSHIP BETWEEN SANCTIONS, INVESTIGATIONS, AND ASSET RECOVERY

This area of work aims to support the development of principles, best practice, standards and policies at the international, regional and national level for linking anti-corruption investigations and anti-corruption sanctions. It focuses on promoting principles developed out research carried out since 2019 and includes our 2023 assessment of the new policies introduced following the imposition of Russian sanctions in 2022. It aims to engage with ongoing discussions and propose new policies globally, regionally and nationally. It also

aims to support partners to engage with best practice. Through this work we also aim to explore the relationship of anti-corruption sanctions to sector specific schemes.

Specific results:

- » Wider adoption of legislation and/or policy linking the imposition of sanctions to the opening of anti-corruption investigations in the sanctioning jurisdiction
- » Further understanding amongst civil society and policy makers of best practice in linking the imposition of sanctions to the opening of anti-corruption investigations
- » Greater understanding of how we can engage as civil society in sector specific sanction schemes

1.B - PARTICIPATORY, TRANSPARENT AND ACCOUNTABLE RECOVERY AND RETURNS

Over the past four years, we have increased our work focussed on advocating for transparency, accountability and participation in asset recovery. This has included developing sets of Civil society principles on accountable asset return in 2021, as well as on asset management, sanctions and victims in 2023, topics identified as priorities by our partners. These principles, particularly those on accountable asset return, have been used to engage nationally and internationally with governments to advocate for more open asset recovery policies. One area where this is particularly important is when indirect modalities are used to return stolen funds and hence where it is harder to rely on national transparency and participation rules to engage with returns.

Our planned work in this area aims to promote these principles at the national, regional and international levels, such as through the UNCAC Conference of State Parties (CoSP) and the International Anti-Corruption Conference (IACC), ourselves and in cooperation with partners, and to particularly focus on advocating for transparency, accountability and participation in return modalities.

i. CIVIL SOCIETY PRINCIPLES

This area of work focusses on promoting developed CSO principles on accountable asset return, sanctions, asset management and victims at the global level and in translating these to the regional level. It also includes work to support partners to translate and advocate for these principles domestically. It further includes work to identify the need for new principles, the development of these principles and their promotion.

Specific results:

- » Wider knowledge of civil society principles for asset recovery at the global, regional and national levels
- » Inclusion of principles in regional and national policies and legislation

ii. RETURN MODALITIES

This area work focusses on developing research and policy on, and advocating for greater transparency and participation in, mechanisms and modalities for the return of assets nationally and internationally. Work in this area includes further research into different forms of return modalities, building on our work on indirect return mechanisms, and ways in which transparency and participation can be meaningfully deployed. It also includes work to support civil society, particularly in priority focus countries, to engage on these topics nationally, regionally and globally.

Specific results:

- » Deeper understanding amongst civil society and policy makers of different forms of return modalities and ways to ensure transparency and participation within them, including lessons learnt from existing examples
- » Further understanding of avenues for victim inclusion in asset return processes
- » Adoption of greater transparency and participation elements in new return modalities

1.C - TACKLING ENABLERS

Engaging on the topic of enablers and enabling environments for cross-border and grand corruption has to date only been a marginal topic of work for CiFAR. This has primarily been due to this thematic area being advanced by several other CSOs and our work therefore being focussed on supporting their efforts. Discussions with partners have indicated that engaging in this topic would be important for CiFAR, especially regarding those enablers that have seen less focus from other actors.

Our planned work in this area therefore aims to address enablers in two specific settings. The first of these are real estate agents in emerging and newer housing markets, a group little addressed in the discourse to date but of high importance in our priority countries. The second is on reputation laundry as a facet of asset recovery.

I. REAL ESTATE AGENTS

This work area aims to address the role of real estate agents in enabling politicians to hide stolen public money. While the real estate sector has been addressed particularly with regards to the luxury real estate sector in Europe and North America, less has been done with respect to real estate markets newer and emerging markets. This area of work focusses on evaluating the extent to which the real estate markets in focus countries in Africa and Latin America are being used by corrupt persons to launder illicit wealth. It also seeks to develop local / city and national level policy and legislative recommendations for addressing issues within the sector and identifying best practice from cities and focus countries.

Specific results:


- » • Identification of the extent to which the real estate market is a conduit for illicit wealth in focus countries
- » • Development and adoption of policy and legislation to address the use of the real estate sector in corrupt schemes in focus countries
- » • Identification and promotion of best practice from focus countries to global audiences.

II. REPUTATION LAUNDRY

Reputation laundry is the practise of using philanthropic investments to improve the reputation of corrupt officials. This is a topic that has gained traction in some countries due to public outcry over investments and gifts identified as being part of an effort to build a veneer of official legitimacy. One of the more famous examples of this were the donations given by the Gaddafi family to UK universities. However, there are also less well-known schemes being used to reputation launder, including the patronage of schools and news outlets taking place in countries across the world. The aim of this area of work will be to work with partners to identify emblematic cases of reputation laundering and use these to advocate at the regional and global levels for action against reputation laundering.

Specific results:

- » Identification of emblematic cases of reputation laundering
- » Greater understanding of how corrupt officials use reputation laundering to avoid prosecution
- » Movement towards addressing reputation laundering



**RESULTS
AREA 2:
IMPLEMENTING
REFORMS**

This results area focusses on national, regional and global engagement to implement best practice and international standards and to promote ongoing reforms; support to CSOs to advocate and campaign for these reforms; direct advocacy towards global and regional reforms.

2.A - NATIONAL LEVEL LEGISLATIVE AND POLICY REFORMS

Over the past four years we have done extensive work to support partners to engage in reforms to legislation and policy to enhance their country's response to asset recovery and to use asset recovery as a tool to support transparency, accountability and participation. This has included reviewing legislation, developing research to support reform recommendations, and direct outreach to governments with partners. While our mandate has and will remain global, in the second half of our previous strategy we focussed on specific countries where we felt the potential for collaboration and reform was stronger.

Our 2024 – 2027 strategy sees a similar focus on priority countries where we will devote more resources to supporting national level reform. These countries are: Angola, Brazil, Kenya, Moldova, and Mozambique.

I. SUPPORT FOR NATIONAL LEVEL REFORMS

This area of work seeks to support implementation of best practice recommendations and international standards. It includes work with partners to support national level reforms that build on international best practice and particularly the CSO principles on asset management and victims, as well as best practice on social reuse. It also includes work undertaken directly by us to call for specific reforms in specific countries, alongside partners. In key returning jurisdictions, it will include work to support the development and publishing of asset recovery strategies, as well as cost breakdowns and systematic publishing of case-based agreements and Memorandums of Understanding (MoUs).

Specific results:

- » A better understanding among partners and officials in priority countries of international asset recovery best practice
- » Identification and adoption of national asset recovery reforms in priority countries based on international best practice and principles, inc. the sets of civil society principles
- » Adoption and publication of legal and policy frameworks for asset recovery in key returning jurisdictions

2.B - GLOBAL AND REGIONAL REFORM

CiFAR has engaged in global and regional reforms since its inception, in particular supporting common civil society positions and voices at global events, such as the Global Forum on Asset Recovery (GFAR) in 2017 and Conferences of States Parties to the UNCAC, as well as at the International Anti-Corruption Conference (IACC). Regionally, our focus has largely been on engagement with the European Union as a bloc, which is both important and in the process of establishing an architecture for improved detection of illicit financial flows and asset recovery. In the last two years of our previous strategy, however, we also became increasingly involved in African Union (AU) level reforms and on the Common African Position on Asset Recovery. Our planned work seeks to build on this global and regional work, while also extending our outreach to regional bodies in the Americas.

I. GLOBAL ENGAGEMENT

Under this area of work we plan to promote dissemination and support adoption of existing and new standards developed under Strategic Area 1 at the global level. This will be done through direct outreach to officials and through conferences and meetings focussed on policy issues at the global level, as well by submitting documents to the UN and other bodies, and working in cooperation with partners to have the greatest impact in these submissions.

Specific results:

- » Policy makers and actors at the global level are more aware of civil society asset recovery standards
- » Civil society standards are submitted to and incorporated within relevant international policy instruments

II. REGIONAL REFORMS

At the regional level, we plan to continue our work to support processes to strengthen asset recovery in the African and European levels. In Africa, focus will be on the implementation of the Common African Position on Asset Recovery (CAPAR) at the regional and national levels and in engaging with sub-regional communities, such as the ARIN networks, EALA, ECOWAS, EAC, and SADC, and sub-regional anti-money laundering groups. At the European level, we will work to strengthen both the political responses to large-scale corruption in the EU, including the adoption and imposition of anti-corruption sanctions, and input into legislative processes to reform how EU Member States respond to asset recovery. In the Americas, we will identify opportunities to engage with regional initiatives on the topic of asset recovery.

Specific results:

- » Greater engagement in African, Americas and European regional asset recovery processes
- » Policy makers and actors at the regional level are more aware of civil society asset recovery standards
- » Civil society standards are submitted to and incorporated within relevant regional processes

2.C - SANCTIONS AND ASSET RECOVERY

Sanctions has been a priority for CiFAR in its work since founding and in the intervening years the use of sanctions as an anti-corruption tool has much expanded. This has included the rapid expansion of country-regimes covering corrupt officials and businesspersons, as well as the roll out of anti-corruption sanctions across many countries. Our work has supported this expansion, providing evidence-based research on what works and what does not when it comes to sanctions as a tool for asset recovery, as well as assessing how sanctions have been or could be used in different national contexts. Our planned work, complementing our work in Area 1 on setting standards linking sanctions and investigations, seeks to build on this expansion and looks particularly into how sanctions are crafted and implemented. It also seeks to support our partners in priority countries to be more involved in sanctions work.

I. SANCTIONS IN DESTINATION COUNTRIES

Our planned work in this area focusses on assessing weaknesses in the implementation and enforcement of sanctions in the Europe and North America and advocating for stronger oversight. Primarily, we aim to research into how sanctions are being implemented and understand whether there are sufficient safeguards and responses to breaches. We also plan to advocate for policies and laws at the national, regional and international levels to better link sanctions to the opening of corruption investigations, building on work completed in 2023.

Specific aims:

- » Improve understandings of structures in place to monitor and enforce anti-corruption sanctions
- » Strengthen sanctions enforcement frameworks in key sanctioning jurisdictions

II. SANCTIONS SUPPORT IN ORIGIN COUNTRIES

In this area we aim to support our CSO partners from Angola, Brazil, Kenya, Moldova, and Mozambique to engage with officials from sanctioning jurisdictions so that they can contribute to the process and better explain it to their constituencies. We also plan to work with them to develop better understandings of the impact of anti-corruption sanctions in their jurisdictions and work with sanctioning jurisdictions to amend negative or unintended consequences of the imposition of sanctions.

Specific results:

- » • Partner organisations in priority countries are able to expertly engage in discussions with officials from sanctioning jurisdictions
- » • Greater understanding among partner organisations and policy officials in sanctioning jurisdictions about the effect of sanctions

RESULTS AREA 3: ADVANCING TRANSPARENCY

This results area encompasses both CiFAR led investigations, data gathering and publishing, and support to investigative journalists and CSOs to undertake investigations and provide information on asset recovery.

3.A - CIFAR LED INVESTIGATIVE AND INFORMATION SHARING WORK

Since 2017, CiFAR has been involved in investigations to identify challenges with asset recovery, to uncover corrupt schemes and to identify the vehicles used to hide money overseas. This has included investigations directly carried out by us, and the coordination of consortiums of journalists. We have also engaged in publishing information and data on asset recovery cases, as well as identifying and publishing new developments and best practice. This has seen us bring our specific expertise in asset recovery and civil society action together with journalists, strengthening both our work. Our planned work under this area seeks to build on this by both conducting further investigations ourselves, as well as publishing information and data relevant to asset recovery.

I. INVESTIGATIONS

Under this area, we will undertake direct investigations on an ad hoc basis and in support of other aims. This will include both investigations directly conducted by us and investigations where we act as part of or in the lead of a consortium. A focus here would be on investigations that are of importance to our priority issues, such as sanctions evasion, or priority countries and countries where we are more heavily engaged in investigative journalist work, due to previous support through our Investigate Programmes.

Specific results:

- » Identification and exposure of illicit financial flows, financial crimes and schemes to hide illicitly acquired wealth
- » Identification of failings in corruption prevention systems

II. INFORMATION AND DATA PUBLICATION

Our work in this area will focus on data collection and publishing information related to asset recovery. This includes on asset recovery cases, return agreements and frameworks for asset recovery. It will specifically aim to collate and publicise national frameworks for asset recovery published by key returning jurisdictions, breakdowns of how costs are divided and any bilateral agreements and MoUs on specific cases. It also includes producing information on the situation in various countries with regards to asset recovery through our country profiles.

Specific results:

- » • Creation of a database of national asset recovery frameworks, policies, agreements and MoUs
- » • Greater engagement of civil society actors in recovery frameworks, policies, agreements and MoUs
- » • Improved accessibility of global asset recovery cases through country profiles and other publications

CiFAR has engaged in global and regional reforms since its inception, in particular supporting common civil society positions and voices at global events, such as the Global Forum on Asset Recovery (GFAR) in 2017 and Conferences of States Parties to the UNCAC, as well as at the International Anti-Corruption Conference (IACC). Regionally, our focus has largely been on engagement with the European Union as a bloc, which is both important and in the process of establishing an architecture for improved detection of illicit financial flows and asset recovery. In the last two years of our previous strategy, however, we also became increasingly involved in African Union (AU) level reforms and on the Common African Position on Asset Recovery. Our planned work seeks to build on this global and regional work, while also extending our outreach to regional bodies in the Americas.

3.B - SUPPORT TO CSOS AND JOURNALISTS TO INVESTIGATE AND EXPOSE CORRUPTION AND ASSET RECOVERY PROCESSES

Our work to date has included support to investigative journalists from North Africa, West Africa, East Africa, the Western Balkans, Madagascar and Western Europe to understand and conduct investigations into corruption and other financial crime. We have also supported civil society organisations from priority countries and beyond to strengthen their national, regional and global engagement on asset recovery. This has included through trainings, direct support and experience sharing. In this, we cooperate with several other investigative journalism focused organisations, including OCCRP, CENOSO, and GIJN, bringing our specialisation on cross-border corruption and asset recovery to the field.

Our planned work in this area aims to continue to build a diverse cohort of investigative journalists across the world, as well as to support our partner CSOs to advocate for transparent, accountable and participatory asset recovery and develop their own investigative skills and networks of investigative journalists.

I. INVESTIGATE PROGRAMME

Under this activity area, we will continue to provide investigative training and support to journalists through our Investigate Programme. This includes a focus on early career journalists and continuing the support system which combines tailored training with mentoring and grants for investigations.

Specific results:

- » More journalists engaged on the medium and long term in investigating and exposing financial crime
- » Stronger links between journalists investigating financial crime across borders

II. STRENGTHENED CSO VOICE ON ASSET RECOVERY

Under this activity area, we will continue to support our partner CSOs to strengthen their engagement at the national, regional and global levels on asset recovery. We will focus on supporting them to have clear and strong public engagement on asset recovery, based on solid evidence. This will build on our work across our strategy and will largely focus on priority countries.

Specific results:

- » Stronger CSO voices in priority countries able to advocate for accountable, transparent and participatory asset recovery
- » Better informed public engagement on asset recovery in priority countries

III. CSO INVESTIGATIVE SUPPORT

Under this activity area, we will expand on our capacity building work and build on our experience as both a directly investigating organisation and our work over the past five years with investigative journalists, to support our CSO partners to carry out independent investigations. This will involve both providing targeted training on how to identify possible financial crime and on investigative techniques, as well as supporting them to engage with both individual investigative journalists and journalist networks.

Specific results:

- » More partner CSOs are able to undertake investigations and collaborate with journalists on cross-border corruption and asset recovery
- » CSO-led investigations identify failings in corruption control and in asset recovery that lead to national level reforms

RESULTS AREA 4: NETWORKS FOR CHANGE

This results area includes work with and support to thematic and case-based CSO networks, the holding of global meetings of CSOs and strengthening CiFAR as a hub for asset recovery.

4.A - SUPPORT TO THEMATIC AND CASE-BASED CSO ADVOCACY

A large part of our previous strategy concentrated on building networks of civil society to jointly work on thematic issues and specific asset recovery cases. Our work in this area included participation in several case-based networks, the development of a thematic and a regional network, and hosting of a global meeting of asset recovery focussed civil society.

Our planned work aims to continue to support these networks, identify opportunities for synergies and mutual learning, and advocate in common with other organisations for more accountable, transparent and participatory asset recovery.

I. SUPPORT TO ESTABLISHED NETWORKS

Our activities under this area will include participation and ad hoc support to the case-based Equatorial Guinea and Uzbekistan networks. It will also include secretariat support to networks we have established: the Sanctions Working Group and the CAPAR CSO network. It further includes participation in and, for the duration of the mandate, co-chairing of the UNCAC Coalition Asset Recovery Working Group.

Specific results:

- » Stronger civil society thematic and case-based cross-border networks

II. ESTABLISHMENT OF A NEW THEMATIC AND CASE-BASED NETWORKS

Under this activity area, we will work with partners to identify the need for new thematic and case-based networks that will make a real difference in global, regional or national asset recovery.

Specific aims:

- » Enhanced CSO coordination on thematic or case priorities
- » Creation of one further thematic and one further case-based network

4.B - JOURNALIST NETWORKS AND HUBS

Our work with investigative journalists in the past years has led to the development of informal networks centred around the different trainings programmes we have run. It has also helped us to identify gaps in support offered to journalists interested in financial crime at the sub-regional level and a need for more institutional support to develop a global network enabling cross-country and cross-regional cooperation.

Our planned activities in this area focus both on network development at the global level and the establishment of a hub for financial investigative journalists in East Africa. East Africa is a particular focus due to the lack of an existing hub for investigative journalism in East Africa, demand from our trainees for greater support and opportunities to build on our existing work in East Africa through closer work with journalists.

I. STRENGTHENING OUR GLOBAL NETWORK OF INVESTIGATE TRAINEES

We plan, under this activity area, to strengthen our global network of former Investigate trainees, which can be used to share resources amongst journalists, as well as facilitate cooperation between them.

Specific results:

- » Stronger cooperation between journalists engaged in investigating financial crime and asset recovery
- » New investigations developed by participants across iterations of our Investigate programme.
- » Partnerships with leading cross-border investigative journalism networks strengthened to support trainees and conduct joint investigations

II. INVESTIGATIVE HUB IN EAST AFRICA

Experience from other regions has shown the importance of sub-regional investigative hubs in providing platforms, resources and support to journalists investigating financial crime. Given the lack of a similar hub in East Africa, our activities here will aim to establish such a hub in Kenya.

Specific results:

- » Establishment of an investigative journalism hub for East Africa
- » Strengthened financial investigative journalism in East Africa
- » Release of more journalist investigations into financial crime in East Africa

4.C - CIVIL SOCIETY ASSET RECOVERY FORUMS

In 2022 we convened the first Global South Forum on asset recovery. Bringing together civil society working on asset recovery from across the world, it was an opportunity to identify common problems, update on cases, and select priority areas for common action in the coming years. Our planned activities in the coming years aim to build on this initial forum and institute recurring meetings to strengthen CSO cooperation on stolen asset recovery.

I. REGULAR GLOBAL CIVIL SOCIETY FORUMS

Under this activity area we aim to hold a civil society Forum every two years, which will convene and bring civil society together from all regions of the world and include CSOs working on important cases. Out of these forums, we plan to develop common advocacy strategies and policy positions for collective engagement globally, regionally and nationally.

Specific aims:

- » Closer collaboration of CSOs engaged in asset recovery
- » More clearly articulated CSO policy positions globally, regionally and nationally
- » Strengthened CSO-CSO thematic and case-based cooperation

4.D - FURTHER DEVELOPMENT OF CIFAR ORGANISATIONAL STRUCTURES AND FINANCIAL STABILITY

Under our previous strategy, CiFAR built itself into a global organisation supporting civil society across a range of areas. It has also seen us branch into leading on specific areas, establishing thematic groups, and developing research and policy. Our staffing and finances also increased, enabling us to strengthen our response and support more organisations. At the same time, it has seen us decide to strategically focus our work on priority countries to have more impact. Our planned activities under the new strategy aim to continue this work, continuing to strengthen our structures and finances.

I. STAFFING

Under this activity area we aim to 1) maintain existing staff positions and 2) to expand our teams. While part of this will be project dependent, a focus here will be to ensure that we are always able to successfully achieve the aims set out in this strategy. We will aim to ensure that our staffing composition reflects the work we do in terms of diversity in doing so and maintain and develop further our staff policies to ensure that we have a welcoming,

flexible and collegiate working environment. As part of this, we will aim to create further opportunities for staff to participate in strategic and daily decision-making and for staff development.

Specific results:

- Staffing appropriate to and with the skills needed to achieve our strategic objectives
- CiFAR remains a welcoming, flexible and collegiate working environment

II. ORGANISATIONAL STRUCTURES

Over the past four years we have developed and revised several internal policies and procedures, as well as having organisationally strengthened the role of the international board and the internal staff structures. Under this activity area we aim to review and update policies and procedures as necessary and further strengthen the role of the board. Having established a new organisation in Kenya during the previous strategy period, we also aim to strengthen our presence in Kenya and East Africa and consider whether other regional offices might be necessary to achieve our strategic aims.

Specific results:

- » Greater involvement of the International Board in engaging with and reviewing CiFAR's work and greater representation by the board of CiFAR
- » Robust internal policies and procedures that contribute to effective work and promote the highest standards of transparency and accountability
- » Established presence in Kenya and East Africa through our Kenya office
- » Reflection on the need for further regional offices and production of a strategy paper on regionalisation of our work

III. FUNDING

Under this activity area we aim to maintain our relationships with existing donors and develop partnerships with new funders. We also aim to support more work of our partner organisations through joint funding applications.

Specific results:

- » Funding secured that enables us to achieve our strategic aims and strengthen organisational sustainability
- » A sustained increase in year-on-year funding
- » A diversified donor base, with at least 2-3 new stable donors secured by the end of the Strategy period
- » Greater support to partner organisations through joint projects, with an emphasis on focus countries and localisation

