

Briefing note on the Integrity Initiative

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Briefing note on the Integrity Initiative

Paul McKeigue, David Miller, Jake Mason, Piers Robinson

Working Group on Syria Propaganda and Media

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This is work in progress: we welcome corrections, comments and further information. We can be contacted at piers.robinson@sheffield.ac.uk. Comments can be posted at Tim Hayward's [blog](#)

1 Summary

- The [Integrity Initiative](#) now accounts for most of the budget of a Scottish-registered charity named the [Institute for Statecraft](#) founded by Daniel Lafayeedney and Chris Donnelly in 2006. Most of the overt funding for this programme — about £2.6 million / year — comes from the Conflict Security and Stability Fund's Russian Language Programme, now merged with a secret Counter Disinformation and Media Programme. Office space in central London and most of the staff salaries, appear to be provided as a covert benefit in kind.
- A close examination of past and present posts held by individuals associated with the Integrity Initiative indicates that specialists in military intelligence and other senior military personnel with responsibility for StratCom (strategic communication) operations are closely involved in the programme.
- The activities of the Integrity Initiative include:
 - setting up covert networks ("clusters") of journalists, academics and military/foreign service StratCom practitioners in each country including the UK: "The programme has begun to create a critical mass of individuals from across society (think tanks, academia, politics, the media, government and the military) whose work is proving to be mutually reinforcing."
 - covert manipulation of the public sphere, including campaigns to smear and suppress dissenters and [block their appointment](#) to public office. The "silencing of pro-Kremlin voices on Serbian TV" is listed as an "achievement".
 - overt attacks on British politicians, academics and other critics of UK government policies, most notably on the Leader of the Opposition and his staff.
 - in the Baltic states and Ukraine, working closely with organizations and governments that foment hatred of ethnic Russian minorities and encourage Holocaust revisionism.
 - promotion of a hate campaign against the Russian Orthodox Church in the Balkans.
- These activities:
 - are not the charitable purposes set out in the Institute of Statecraft's constitution, and are not charitable purposes in general.
 - violate the accepted principle that government funding may not be used for partisan political purposes.
 - indicate that the Government has misled the House of Commons Foreign Affairs Committee about the scope of the Russian Language Programme of the Conflict Security and Stability Fund.

- indicate that military units specialized for information warfare are now participating in covert manipulation of political discourse at home, subverting parliamentary government.
- have contributed to narrowing the range of public discourse so as to marginalize reality-based evaluation of policy options for relations with Russia and evidence-based assessment of events in which Russian involvement is alleged.
- There are serious concerns about the transparency of the Institute for Statecraft (formerly the Institute of Statecraft and Governance):
 - Its registered corporate address is a derelict building in rural Scotland which is [being demolished](#)
 - In a High Court [judgement](#) in 2006 against Lafayeedney, the judge commented adversely on his probity and his business methods.
 - The filed accounts show unexplained "defects" for the year ending 23 November 2010. After the Board had approved accounts showing income of £158,470, Lafayeedney filed accounts for a dormant company. The accounts were amended more than a year later by Donnelly who filed the accounts that the Board had approved.
 - Donnelly and Lafayeedney have on at least two occasions set up Scottish Limited Liability Partnerships (LLPs) with names that could easily be confused with existing charities or foundations. Thus in 2009 they set up [ISG Corporate LLP](#) at a time when the acronym ISG was used for the Institute of Statecraft and Governance by a charity with which it was in partnership, and in 2010 they set up [Council on Foreign Relations](#) as an LLP, with a name that is identical to that of a respected US [foreign policy think tank](#).
 - Scottish Limited Partnerships and LLPs are notorious as a [vehicle for non-transparent financial transfers](#).

2 Release of documents relating to the Integrity Initiative

A [first tranche](#) of documents relating to the Integrity Institute were released on 5 November 2018. The documents lay unnoticed for two weeks until 23 November, when a [story](#) on RT brought them to attention. A [second tranche](#) of documents was released on 29 November and a [third tranche](#) on December 13. The documents were represented as the result of a hack though it is possible that this disguises a leak by an insider. All documents are in PDF format with no metadata such as timestamps or authors preserved.

In response to the first tranche, the Integrity Institute [confirmed](#) that a leak of documents occurred, and described the documents as follows:

Although it is clear that much of the material was indeed on the Integrity Initiative or Institute systems, much of it is dated and was never used. In particular, many of the names published were on an internal list of experts in this field who had been considered as potential invitees to future cooperation. In the event, many were never contacted by the Integrity Initiative and did not contribute to it.

The Integrity Initiative has not asserted that any of the released documents were faked or tampered with. There are no internal signs that the documents have been tampered with although they contain minor mistakes such as misspelt names.

A full list of all documents released so far, with annotations, is given in the Appendix.

3 Sources of funding for the Integrity Initiative

The domain name integrityinitiative.net was first [registered](#) on 22 June 2015.

In the year to 23 November 2015 the Institute [received](#) £46,639 described as ‘funding from FW Investments Partnership, Foreign Office, Centre for Naval Analysis [a US-government funded think tank], CAFOD for various national and international initiatives’.

In the year to 23 November 2016 the Institute [received](#):

- £87,250 unrestricted funds, described as ‘designated funds for various UK security, NHS, Royal Navy, NATO, Ukrainian and Russian research programmes’
- £33,441 described as ‘funding from Dulverton Trust and the FCO for a national and international programme’

There is no explicit mention of support for creation of the Integrity Initiative until the year to 23 November 2017 when the Institute [received](#) £307,000 from a "private donor" for the Integrity Initiative, and the first £124,567 from the Foreign Office grant of £250,000 for the financial years 2017/18.

A document dated 14 March 2017 is a draft bid for MoD funding for the period 2017-2019, evidently based on discussions with MoD officials. As the first application to the FCO is dated only six weeks later, it appears likely that the outcome of these discussions was that Donnelly was advised to apply through the FCO rather than directly to MoD.

3.1 FCO-led Russian Language Programme

The applications to the FCO request funding from the **Russian Language Strategic Communication Programme**. This appears to be the [Russian Language Programme of the Conflict Security and Stability Fund](#), described in the Government’s [response](#) on 20 July 2017 to the House of Commons Foreign Affairs Committee’s [report on the UK’s relations with Russia](#) published four months earlier:

The FCO-led Russian Language Programme brings together expertise from the FCO, MOD, and DFID as well as external experts to co-ordinate a set of projects worth some £70m over four years. These projects seek to enhance independent media; to engage with Russian speakers; and to expose Russian Government disinformation.

Through this programme, the Government is working with a range of partners to enhance the quality of public and independent Russian language media so that it is able to provide Russian-speakers with reliable access to accurate information. The type of support given includes mentoring with UK media organisations; consultancy on programming; funded co-productions and support for regional Russian language media initiatives.

The anti-Russian tone of the material produced by the Integrity Initiative and its partner organizations, including promotion of what appears to be a hate campaign against the Russian Orthodox Church, would be unlikely to find ready welcome among Russian speakers. Yet the title of the programme and the Government's description make clear that the stated remit of the programme was to counter disinformation and provide reliable information **in the Russian language**. Without Parliamentary oversight, this remit appears to have been changed to include operations in other languages including English-language media in the UK. As the application from the Institute of Statecraft to this programme was dated 23 April 2017 and this Government response was dated 20 July 2017, it is clear that the Government **misled the Foreign Affairs Committee** by describing the Russian Language Programme as aimed at Russian speakers and as targeting Russian language media.

In an attempt to explain this away, Sir Alan Duncan, the Minister of State at the Foreign Office gave a misleading [reply](#) to a parliamentary question.

In April 2016 we launched a new four year strategic communications and media development programme authorised by the National Security Council, called the Counter Disinformation and Media Development Programme. The former Russian Language Programme was amalgamated into this. The funding provided to the Institute for Statecraft was funded from the Counter Disinformation and Media Development Programme.

Duncan does not say when the Russian Language Programme was amalgamated into the Counter Disinformation and Media Development Programme, and does not explicitly say that all funding to the Institute was provided from this programme although this would be a natural reading of his reply. This [document](#) shows that the Russian Language Programme, one of the components of the Conflict Security and Stability Fund, was still current in the financial year 2017-18 with annual expenditure of £8 million. The first year of funding for the Integrity Initiative must therefore have been awarded from this programme, as implied by the application for 2017/18. It is difficult to read Duncan's answer as anything but an attempt to mislead without actually telling a lie. Duncan was [criticized](#) by MPs for misleading them further by attempting to maintain that the Integrity Initiative's Twitter account was not included in the activities funded by the FCO grant.

In answer to another question requesting a list of grants funded by the Russian Language Programme, Sir Alan Duncan [replied](#):

Information about individual projects within the Programme will not be published, as this information could then be used to actively attempt to disrupt and undermine the Programme's effectiveness.

In the CSSF [summaries](#) for the year 2018-19 neither the Russian Language programme nor the new Counter Disinformation and Media Development Programme are listed, implying either that the Counter Disinformation programme is not part of the CSSF or that it is secret. It is however possible to identify recipients from [tables](#) of the FCO's monthly expenditure which show recent spending of between £100,000 and £200,000 per month on the Institute for Statecraft, although these do not identify the programme from which this funding is coming.

The total cost of the project for the financial year 2017-18 was given as £582,635 of which £480,635 was from FCO and the rest from NATO, "partner institutions" and the Lithuanian Ministry of Defence. The [budget projection for 2018-19](#) gives a budget of £1.96 million for the funding requested from the FCO for 2018-19. The answer to a parliamentary question [confirmed](#) that this was awarded in full by the Foreign Office.

3.2 Co-funding

Co-funding of the Integrity Initiative for 2018-19 is listed:

Funding from HQ NATO Public Diplomacy, £12,000 for each inaugural workshop = £168,000

Funding from partner institutions £5,000 for each inaugural workshop = £70,000

Funding from NATO HQ for educational video films – free provision of camera team

Funding from Lithuanian MOD to provide free all costs for their stratcom team for a monthly trip to support a new hub/cluster creation and to educate cluster leaders and key people in Vilnius in infowar techniques = £20,000

Funding from US State Dept, £250,000 for research and dissemination activities (excluding any activity in USA)

Funding from Smith Richardson Foundation, £45,000 for cluster activities in Europe and USA

Funding from Facebook, £100,000 for research and education activities

Funding from German business community, £25,000 for research and dissemination in EU countries

This would give a total income of £2.6 million for 2018-19. As discussed below, this does not include office costs, for which no funding source is given. The accounts filed for the years ending 23 November 2016 and 23 November 2017 state that the Institute of Statecraft had no employees during 2015, 2016 or 2017, implying that another agency was employing them and seconding them to work on the programme. The budget submitted to the FCO for 2018/19 for the Integrity Initiative includes salary costs for only four staff including Donnelly, though another document lists 18 individuals as the "Temple Place resident team".

The State Department quite properly **stipulates that the grant funding it provides may not be spent within the United States**. The UK FCO appears to have no such scruples about funding covert political activities within the UK.

The [handbook](#) instructs staff to say if asked about funding that:

The IfS gets its funding from multiple sources to ensure its independence. These include: private individuals; charitable foundations; international organisations (EU, NATO); UK Govt (FCO, MOD)

There is no other mention in the documents of funding from the UK MoD. The plan is that the "clusters" should eventually be sustained by longer-term funding from NATO and the Atlantic Treaty Association:-

HQ NATO PDD [Public Diplomacy Division] has proved a reliable source of funding for national clusters. The ATA [Atlantic Treaty Association] promises to be the same, giving access to other pots of money within NATO and member nations.

The role of NATO here is not one of collective defence, but instead one of covert political manipulation within its member countries.

4 The offices and team of the Integrity Initiative

4.1 Offices and team

The Institute for Statecraft has an office at Two Temple Place, a historic building completed in 1895 by William Waldorf Astor and now owned by a charity, the [Bulldog Trust](#). There is office space in the basement, shared by the Fore (a project initiated by the Bulldog Trust) and the Institute for Statecraft. Based on the footprint of the building, this would be about 4000 square feet of offices. The budget documents for the Integrity Initiative do not include any provision for office costs. This suggests that office rental costs are being covered by some other agency in the public or private sector and that for some reason this is being concealed. 2000 square feet of fully serviced office space in central London would cost about £180,000 per year, so this is a substantial benefit in kind. For the office team, the operation is being run on a tight budget — economy-class flights and only £70/night for hotels or AirBnB.

The "Temple Place resident team" of the Institute for Statecraft is listed as

Simon Bracey Lane, Stephen Dalziel, Maria de Goeij, Nico de Pedro, Yusuf Desai, Chris Donnelly, Euan Grant, Charlie Hatton, Chris Herson, Todd Leventhal, Victor Madeira, Johanna Moehring, Ben Robinson, Greg Rowett, Keith Sargent, Jon Searle, Guy Spindler, James Wilson.

"Specialist team members" are listed as

Eduard Abrahamyan, Diane Allen, Jamal Al-Tahat, Josh Arnold-Foster, Barrie Axford, Anne Bader, Qique Badia-Masoni, Oleksandr Danylyuk, Martin Dubbey, Harold Elletson, Perry Fawcett, Mark Galeotti, Babak Ganji, Francis Ghiles, Keir Giles, Glen Grant, Roger Golland, Jon Hazel, Steve Johnson, Phil Jolley, Stephen Jolly, Ren Kapur, Dan Kaszeta, Dmytro Kolomoiets, Karel Kullamaa, Birgy Lorenz, John Lough, Tim Reilly, Alan Riley, Andy Settle, James Sherr, Andrew Shortland, Luis Simon, Henry Strickland, Tomas Tauginas, Jason Wiseman, Sir Andrew Wood.

(SC) is appended to the names of Donnelly, Hazel, Kapur (DV) is appended to the names of Allen, Arnold-Foster, Fawcett, Golland, Johnson, Settle, Shortland

The names listed as "Team" in the Integrity Initiative Handbook dated 30 May 2018 are almost the same as the names listed as "Temple Place Resident Team" for the Institute of Statecraft, with a few additional names from the "Specialist Team members" list. This indicates that almost all core staff of the Institute for Statecraft are working on the Integrity Initiative programme.

On another "specialist and core" list the additional names Jonathan Chetwynd (possibly Chetwynd-Palmer, ex-army based in South Africa), Sean Cronin (possibly Cronin-Nowakowski, ex-army now KPMG) appear.

In addition to Donnelly and Lafayeedney, at least eight others on the team have a military background or have worked at the Defence Academy research unit that Donnelly headed.

4.1.1 Team members with military background (excluding founders Donnelly and Lafayeedney)

- **Stephen Dalziel** – his [bio](#) includes a year on a TA attachment in the Army, followed by six years at the Soviet Studies Research Centre, Royal Military Academy, Sandhurst where Donnelly was also based. From 1988 to 2004 he worked at the BBC as a Russian Affairs analyst, followed by five years as Executive Director of the Russo-British Chamber of Commerce while also working for and starting a [consultancy firm](#).
- **Tim Reilly** – "Arctic/Russia-China specialist". [Commissioned](#) into the Parachute Regiment in 1984 and served till 1990. He subsequently worked on business development in emerging markets including Russia. An [article](#) he published in March 2017 advocated a realist approach to post-Brexit relations with Russia.
- **Alex Finnen** – Executive Officer, Specialist Group Military Intelligence. Born in [June 1952](#), he served at first in the Corps of Royal Engineers (Territorial Army), where he was [promoted](#) to Captain in 1994 and then Major [in 1999](#). He [transferred to the Intelligence Corps](#) as Major on 1 June 2005. In 2010 he [was awarded](#) The Efficiency Decoration (Territorial) Medal. In 2014 [he was listed](#) as with the Parachute Regiment. In 2016 he [was again listed](#) with the Intelligence Corps. In his civilian role he is [described](#) as a 'retired member of the UK's Foreign and Commonwealth Office (FCO) who, since retiring, has served on a variety of contracts with the EU and the UK Department for International Development (DFID).' There is no mention of Finnen in the [Directory of British Diplomats](#) based on officially published data. In 2007 he was [Deputy Head of the OSCE presence in Albania](#). [A biographical note](#) records that he served as Director General for Elections in Bosnia. He has provided electoral advice to FCO, DFID and the UK Ministry of Defence for a range of countries from 1996 to date. He has a doctorate and is an Honorary Associate Fellow of the Centre for Global Politics, Economy and Society at Oxford Brookes University.
- **Glen Grant**, – former British Army Lt-Colonel and [artillery expert](#) in the Joint Intelligence Cell during the 1991 Gulf War, who provides somewhat unrealistic [military advice](#) to the Kiev government.
- **Diane Allen** – "former Royal Signals and currently Intelligence Corps reserve Lt Col; former CO Specialist Group Military Intelligence; worked with the Land Information Assessment Group and developing infowar capacity with the Army's 77 Brigade" [Awarded an OBE](#) in June 2018.
- **Jonathan Hazel** – Intelligence Corps. Mentioned in dispatches as Captain (1993), Colonel in the Intelligence Corps by 2010 when he was the [author](#) of *The Conflict With Extreme Islamism – How To Compete In The Global Information Environment* (2010).

4.1.2 Team members with defence (non-military) background

Of the non-military team members, two have worked at the Advanced Research Assessment Group at the Defence Academy, headed by Donnelly from 2003 to 2007, and two others have worked in defence-related roles:

- **Anne Bader** – [formerly served](#) as a Senior Research Fellow and Director, Advanced Research Assessment Group.
- **James Sherr** – Between 1995-2008 he was [a Fellow](#) at the Advanced Research & Assessment Group.
- **Stephen Jolly** – was director of communications at MoD from December 2012 until June 2015. He left this role to take a research assignment as a senior research fellow in Military Information Operations at the Defence Academy on behalf of the MoD. According to Jolly he 'trained as a special operations reservist/officer cadet with 15 (UK) Information Support Group, the UK military's tri-service psychological operations unit. As a result, between 1999-2001, he held a Visiting Fellowship in Psychological Warfare at the International Centre for Security Analysis, King's College London. It was

in this capacity that he was commissioned by the International Public Relations Association to write the 2000 Mardin Essay on Psychological Warfare and Public Relations.’ A [2011 biographical note](#) states that Jolly ‘was formerly an instructor on the Military Information Support Operations Course at the UK’s Defence Intelligence & Security School, Chicksands (1997-2001).’

- [Julian Lindley-French](#) holds many honorary or visiting appointments:

Currently Senior Fellow at the Institute of Statecraft London, Director of Europa Analytica, Distinguished Visiting Research Fellow at the National Defense University in Washington, a member of the Strategic Advisory Group at the Atlantic Council in Washington, Visiting Programme Director at Wilton Park, Honorary Fellow of the Strategy and Security Institute at the University of Exeter. He is also a Member of the Strategic Advisory Panel of the UK Chief of Defence Staff.

4.1.3 Team members with no defence background

- **Simon Bracey Lane** – described as "US & election campaign specialist". In 2016 Bracey Lane was [working in a field level position](#) in Bernie Sanders’s Iowa campaign headquarters. His bio is given on the website for the Adventium meeting.

Simon Bracey Lane has three years of elections experience in both the US & the UK. He has managed the distribution of communications for the Integrity Initiative cluster system and for the last year been developing the Integrity Initiative’s presence across Europe & the US. He has worked specifically to counter malign interference in Greece, Serbia, Montenegro, Bosnia, Lithuania and the US. This work includes the commissioning of several papers, building discussion events and the formation of a media observatory.

- **Chris Heron** – formerly a team manager at BBC monitoring, appears to have responsibility for social media.
- **Professor Alan Riley** – expertise on the energy market
- **Victor Madeira** – expertise given as "Intelligence and National Security, Orthodox Church". A [bio](#) announcing his appointment as a lecturer at the University of Buckingham stated:

Dr Victor Madeira comes to us from Cambridge (where he has been a lecturer and tutor for four years, working with Professor Christopher Andrew and Sir Richard Dearlove) and the Institute for Statecraft in London, directed by Chris Donnelly, where he is a Senior Fellow working on 21st Century security architecture.

- **Guy Spindler** – Chief Operating Officer, on the Companies House documents. He has broad responsibilities including information security. He appears on a [list](#) of MI6 officers released in 1999 with the annotation "Guy David St. John Kelso Spindler: 87 Moscow, 97 Pretoria; dob 1962."
- **Harold Elletson** – former MP and sometime MI6 agent who supervises the German Cluster. According to a [report in 2002](#) "when Elletson became an MP in 1992, John Major personally authorised the intelligence service to continue using him as a ‘secret contact’."
- **Charlie Hatton** – expertise described as Marketing, PR, Project Development & Management, International relations – English and Italian
- **Johanna Moehring** – Military Power and Influence campaigns of part of a wider strategy – French, German, English, Russian
- **Ben Robinson** – Ukraine / Eastern Europe, Photographer, Education specialist – English, Russian
- **Nico de Pedro** – Analytical Russia specialist
- **Todd Leventhal** – State Department official whose role is described later

- **Martin Dubbey** – Managing director of Harod Associates, involved in preparing anti-doping case against Russian athletes. Also sole director of Astutus Intelligence, where Philip Matthews (Trustee of the Institute of Statecraft) was director from 2015 to 2016.

4.2 UK Cluster

The UK Cluster document lists the following groups, indicating that the Integrity Initiative’s ambitions extend to other policy issues including NHS reform:

- GIG (Governance and Integrity Group) – one name
- NHS Reform Group – no names yet
- Communication Engagement & Dialogue Group – no names yet
- Defence Acquisition Reform Group – no names yet
- Office Core Team – Fellows
- Office Core Team – Associates
- UK General – Inner Core – Russia
- UK General – Inner Core – Military & Defence
- UK General – Outer Core – Russia
- UK General – Outer Core – Military & Defence
- UK Journalists

From the expenditure records and budgets it appears that most cluster members who were not employees of the Institute were unpaid, except for a few consultancy payments for specific tasks such as preparing a report. A more subtle incentive to take part in such a scheme would have been the advantages of being on the inside, networking with senior government officials and military intelligence specialists. All concerned would know that this would open doors to future posts, consultancies and grant funding. On this basis, participants in such a network could reasonably be expected to declare their membership as a competing interest, whatever their personal motives for participating.

We have established that some of those included on the cluster lists had simply been on email lists, usually because they had attended a meeting organized by the Institute for Statecraft. However it is still relevant to study the identities and affiliations of these individuals because this may reveal what groups the Integrity Initiative was trying to draw into its network.

The procedure for the initial cluster foundation workshop is described in the budget document for 2018/19 as follows:

Connect cluster members, create internal national network, formally introduce them to the Integrity Initiative aims, practices and methodologies, establish target programme for research, dissemination and events.

New cluster able to self-organise. Increased coordination and shared best practice from cluster individuals and organisations working at the forefront of efforts countering RU disinfo, increased resource material for an Int’l audience.

Initial group of at least 8 members between core hub and network. Members agree team roles and start putting structures in place. Start exchanges of information with other clusters. Begin work on research and dissemination activities

5 Relationships of the Integrity Initiative to other organizations

The partner organizations of the Integrity initiative make up a nexus of NATO-connected think tanks including the [Centre for European Reform](#), the neoconservative Henry Jackson Society and the Atlantic Council. Many individuals from these think tanks are also listed in the "Clusters".

5.1 Partner organizations listed on the Integrity Initiative website

- Barcelona Centre for International Affairs (CIDOB)
- The Beacon Project – link [beaconproject.info](#) leads to "site under construction". The domain name was registered on 19 April 2016 in Bratislava. This appears to be a [project](#) announced by the International Republican Institute in April 2016 that has never gone live.
- Centre for European Policy Analysis (Washington DC) – Mission is "to promote an economically vibrant, strategically secure, and politically free Europe with close and enduring ties to the United States." Edward Lucas is a Senior Vice-President.
- European Values (Czechia) – "non-governmental policy institute defending liberal democracy" led by Jakub Janda who is named in the documents as a member of one of the 'clusters'.
 - Kremlin Watch (Czechia) – a strategic program of the European Values Think-Tank
 - Political Capital Policy Research and Consulting Institute (Hungary)
- University of Macedonia Public Opinion Research Unit
- Res – Public Affairs. Corporate Affairs GmbH (Berlin)

5.2 Other organizations listed as associated with the Integrity Initiative

- [StopFake](#) – there are multiple references to working with them in the 2018 application and budget plan:

We also worked with Stopfake in Ukraine, examining the excellent work done on this by them and their partners

We also arranged for the Lithuanian team to provide training on a regular basis for all our cluster leaders in the methodology of tracking and exposing Russian malign influence and disinformation, and linked them directly to the Ukrainian Stopfake leadership and to the UK LSE team (whom we took to Vilnius) to exchange practical experience.

Provide guest articles from Ifs and our clusters for StopFake's printed material published and distributed along the contact line in Eastern Ukraine

Sending cluster members to educational sessions abroad (IREX, Detector Media, StopFake, EUvsDisinfo, LT MOD Stratcom)

A modular training programme (based on IREX/StopFake material) that adapts media source examples as needed to be most relevant and accessible across our cluster network

StopFake [received](#) direct funding of £80145 from the FCO in April 2018.

- Henry Jackson Society – Drew Foxall is listed as Inner Core: Russia
- Atlantic Treaty Association and Atlantic Council The Atlantic Treaty Association (ATA) is [described](#) by NATO as

an umbrella organisation for the separate national associations, voluntary organisations and non-governmental organisations that formed to uphold the values of the Alliance after its creation in 1949. The Youth Atlantic Treaty Association (YATA) is the youth branch of the ATA and was formed in 1996.

The Atlantic Council is the US affiliate of the ATA. Four individuals with Atlantic Council email addresses are listed: Anders Aslund, Elizabeth Braw, Robert Nurick and Ben Nimmo.

In an "impact assessment" dated 19 April 2016 of what was then called the "Institute of Statecraft Project on Russian Influence", Nimmo is named as sole author of 12 of 22 outputs, and one has Nimmo and Edward Lucas as joint authors. Nimmo appears on a "production schedule" as scheduled to produce 10,000 words on "Mapping Russia's whole influence machine" by end of June 2016. Nimmo was receiving a monthly consultancy fee of £2500 in January 2016, and in August 2016 he invoiced the Institute for Statecraft for £5000 for "August work on Integrity Initiative". He is [co-founder](#) with Graham Brookie of the Atlantic Council's Digital Forensic Lab, which [received](#) £450,000 from the Foreign Office in August 2018

The cluster leader Savo Kentera is listed as President of Atlantic Council Montenegro.

- **Centre for European Reform** – Ian Bond, director of foreign policy
- **Royal United Services Institute** – Igor Sutyagin
- **Chatham House** – Three individuals with Chatham House emails are listed: James Nixey, Orsyia Lutsevych, James Sherr
- **European Council on Foreign Relations** – Four individuals with ECFR emails are listed: Nika Prislan, Borja Lasheras, Kadri Liik, Manuel Lafont Rapnoul. The European Council on Foreign relations receives direct funding from the FCO.
- **Hermitage Fund** Two emails: William Browder, Vadim Kleiner

6 Role of the FCO and the Ministry of Defence in the Integrity Initiative

6.1 FCO staff associated with the Integrity Initiative

Three of those listed in the UK Cluster have held posts in or as director of the FCO's Eastern Research Group:

- **Duncan Allan** – a [bio](#) gives his most recent FCO post as Principal Research Analyst, Eastern Research Group. "A member of the FCO's Research Analysts since 1989, I've spent my career following the countries of the former Soviet Union, in particular Russia, Ukraine, Belarus and Moldova. I've completed full postings and spells of temporary duty in Russia, Ukraine and Central Asia. I've also been seconded to FCO policy departments and the Cabinet Office". He retired from the FCO in 2017, and is now director of Octant Research & Analysis Ltd and [Associate Fellow](#) on the Russia and Eurasia Programme at Chatham House. In October 2018 Allan [published a paper](#) with Chatham House on the

Salisbury poisonings calling for more confrontational responses by the UK government to the attack on the Skripals which he attributed to the Russian state.

- **Craig Oliphant** – [head of the Eastern Research Group](#) until he left the FCO in 2010, now Senior Adviser at a London-based NGO, Peaceful Change Initiative.
- **Alan Parfitt** – Head of the FCO Eastern Research Group [as of August 2017](#). He has held this position [since at least 2010](#).

Four have experience in communications:

- **Catherine Crozier** – [listed](#) on the Government Communication Service ‘people finder’ website as a Strategic Communications Advisor, Ministry of Defence.
- **Andy Pryce** – Head of ‘Counter Disinformation and Media Development’ at the [Foreign and Commonwealth Office](#) in London, a position he does not advertise on his [LinkedIn page](#), which lists the following previous postings:
 - British Resident Commissioner, British High Commission, Castries – Sep 2013 – Jun 2015. Responsible for UK relations with St Lucia and St Vincent and the Grenadines.
 - Deputy Consul General British Consulate General Houston – Feb 2009 – Sep 2013. Leader on development and delivery of British Government strategy across Texas, Oklahoma, Louisiana and Arkansas.
 - Head of Public Affairs, British Embassy Washington – Oct 2007 – Feb 2009. Led UK public advocacy in the US; thoroughly modernised UK outreach; integrated social media campaigning, direct mail with traditional diplomacy.
 - Head of EU Affairs, British Embassy Helsinki – Dec 2003 – Oct 2007. Led UK EU advocacy in Finland during UK and Finnish Presidencies of the EU.
 - Deputy Programme Manager Foreign and Commonwealth Office – 2002 – 2003 Led project to design, develop and deliver paradigm shifting new Intranet for British Foreign Service.
- **Richard Slack** – In 2011 Slack [was listed](#) as based in the British Embassy in Baghdad and in 2015 he [was listed](#) as Head of Communications at the British Embassy in Kabul. His current role is unclear.
- **Joanna Szostek** – now Lecturer in Political Communication, University of Glasgow. Previously based at Royal Holloway in the University of London, Szostek [conducted a three-year fellowship](#) from the European Commission on ‘the reception of rival narratives about international politics among different groups of Ukrainians’. The project incorporated a secondment to the UK Foreign and Commonwealth Office from April to August 2017, during which she attended a seminar at the Institute of Statecraft.

The remaining one is **Claire Lawrence**, UK ambassador to Lithuania since 2015.

Of the four listed FCO staff who are to some extent specialists in communications, Crozier has left to work at the MoD, Szostek is an academic who was only briefly seconded to the FCO as part of a research project (Szostek), Slack has held a recent post that was at only mid-level seniority, and Pryce appears not to have held any previous posts in communications, his most recent posting being to the Caribbean.

The title of ‘Head of Counter Disinformation and Media Development’ appears in the public domain for Pryce only in relation to events at which he has appeared, for example at [Stratcom DC](#) organised by the Atlantic Council or [in the press](#). On his [own LinkedIn page](#) he refers to himself only as a ‘diplomat’ and a ‘senior strategic advisor’. As noted above, in a written answer to a parliamentary question in December 2018 the FCO [stated](#):

In April 2016 we launched a new four year strategic communications and media development programme authorised by the National Security Council, called the Counter Disinformation and Media Development Programme.

This programme had not previously been mentioned in public. Pryce’s job title suggests that he is the programme officer for this scheme.

6.2 Ministry of Defence and military personnel named in documents

6.2.1 Key to acronyms

The [acronyms](#) embedded in the local-parts of the MoD email addresses listed in the documents give some clue to the scale and diversity of StratCom operations now overseen by the Ministry of Defence.

- SGMI – Specialist Group Military Intelligence, based at Denison Barracks, Hermitage, Thatcham, Berkshire. SGMI is part of the [1st Intelligence, Surveillance and Reconnaissance Brigade](#) which became operational on 1 September 2014. Among the other units in 1 ISR are 21 and 23 Special Air Service Regiments, 1-7 Military Intelligence Battalions, the Land Intelligence Fusion Centre and the Defence Cultural and Linguistic Support Unit. Overall it has 3,300 Regular and 3,000 Reservist personnel. [According to the Army](#) "approximately 55% of the Intelligence Corps is employed within the 1st Intelligence, Surveillance and Reconnaissance (ISR) Brigade".
- 77X – [77th Brigade](#) also based at Denison Barracks and responsible for "information activity". According to an [FoI disclosure](#) the 77th Brigade (in mid 2018) included 203 Regular Army posts of which 190 were filled and 271 Reserve posts of which 150 were filled, making a total strength of 340 personnel.
- PJHQ – Permanent Joint Headquarters, based in Northwood
 - J2 – operational intelligence division of PJHQ
 - CGS – office of Chief of General Staff (head of the Army)
 - MSE – Military Strategic Effects, part of the Operations Directorate in Whitehall. This branch was established around 1999 to 2000 when it was named Targeting and Information Operations. It was renamed Military Strategic effects in 2013. In mid 2018, according to an FoI disclosure, it contained 34 staff. From March 2014 to July 2015 it was headed by Chris Brazier, from then till March 2018 by Commodore Jonathan Burr, and since then by Air Commodore [Nigel Colman](#).
 - FSECC – Full Spectrum Effects Coordination Cell, a [cross-department group](#) set up in 2015 and overseen by a senior Tasking and Oversight Board chaired by Gwyn Jenkins (Deputy National Security Adviser for Conflict, Stability & Defence). The cell is based in MoD in Whitehall and works, [according to a former member](#) 'in co-operation with the Cabinet Office, HMT, FCO, DfID, Home Office, GCHQ, MI5 and SIS, principally against ISIL/Daesh.'

6.2.2 MoD affiliations

- **David Fields** – his [LinkedIn profile](#) states that he was "Part of a small team which wrote the UK Ministry of Defence's strategic approach towards Russia." but is no longer employed by the MoD.
- **Joseph Walker-Cousins** appears in three of the documents: under Saudi Arabia in the [xcountry](#) document, and in two other lists that include military officers working closely with the Integrity Initiative.

He was [commissioned as Second Lieutenant \(on probation\)](#) in the Honourable Artillery Company on 1 April 2002 with seniority backdated, and the next day [resigned his commission](#). The reporting of these events in the Gazette was delayed. His [LinkedIn profile](#) records that he worked as an intern in the Palestinian Centre for Human Rights in Gaza from September 2002 to February 2003, then immediately resumed his Army career as "Liaison Officer, British Army Reserves (including multiple tours in Iraq)" between Feb 2003 and Feb 2005. In December 2003 he [joined the TA Intelligence Corps](#) as Second Lieutenant. On 2 August 2006 he was [promoted to captain](#) in the TA Intelligence Corps. Information about his recent military career is available from a [drunk driving case](#) which came to court in May 2015. Major Alex Finnen, his superior officer, provided a character reference, telling the court that "Capt Walker-Cousins was due to be promoted this year but that 'would definitely not be happening' as a result of his actions.

In civilian life his [LinkedIn profile](#) records that he worked at Aegis Defence Services from Feb 2005 to May 2006, and then joined the regular Army as ‘Senior Staff Officer’ in September 2006 in Kabul. He was stabilisation adviser to the UK’s special envoy in Benghazi from 2011 to 2012 and head of the British Embassy Office in Benghazi from 2012-2014. Since April 2014, while still a reservist in the Intelligence Corps he has held the post of [Director, Middle East Business Development](#) for KBR, which [holds](#) the Operational Support Capability Contract for the Ministry of Defence.

On 13 March 2015 he contributed an [article on Libya](#) to The Guardian. On 17 November 2015 he was [appointed](#) as specialist adviser to the Foreign Affairs Committee’s investigation of the British role in the attack on Libya, and made which included his position with KBR and his military status as ‘Staff Officer, MENA Region, British Army Reserve’. In March 2018 he contributed an [article](#) extolling Crown Prince Mohammed bin Salman’s "transformation of the Saudi economy" to the Institute for Statecraft’s website. He did not reveal his affiliation to the Intelligence Corps in any of these contributions.

- Lt Col **Giles Harris** – Army Strategic Engagement Team, Ministry of Defence.
- **Charlie Hornick** email local-part CGS-CIG-SO1b – US army officer seconded to the office of the Chief of the General Staff, who has recently [warned](#) of the Russian threat.
- **Arron Rahaman** email local-part OpsDir-MSE-StratComEurope – an online [bio](#) gives his current post as Strategic Communication Adviser (NATO and European Policy), Ministry of Defence. He is aged 32 and has a degree in marketing but no military experience.
- **Nick Washer** email local-part FSECC-1 UK Inner Core: Defence.
- **Nick Smith** email local-part FSECC-4 UK Inner Core: Defence.
- **Joe Green** email local-part PJHQ-J2-OPS-SO1-1. SO1 is staff officer level 1, equivalent to Lt Col.
- **Paul Kitching** email local-part PJHQ-J2-EURASIA-SO3-3. is staff officer level 3, equivalent to Captain
- Brigadier **Chris Bell**, commander of 77 Brigade. His predecessor, **Alastair Aitken**, also appears on the list with a private email address.

The involvement of these senior officers from military intelligence and information warfare units suggests that the MoD rather than the FCO is driving the Integrity Initiative programme. It is also of interest that reservists in Military Intelligence appear to be working under civilian cover without disclosing their intelligence background, though this can sometimes be found by searching the London Gazette.

Further evidence of the close links of the Integrity Initiative Programme with senior officers in military intelligence units comes from the schedule for the visit of Ukrainian special forces officers in July 2016, organized by the Institute for Statecraft. They had briefings or workshops with 3 Military Intelligence Battalion, HQ Field Army, 77 Brigade, Specialist Group Military Intelligence, NATO Intelligence Fusion Centre, and a final meeting with PJHQ staff who came to the Institute for Statecraft. The participants listed for 77 Brigade were the Commander, the Chief of Staff and the Deputy Chief of Staff.

6.2.3 Relation to the MoD’s StratCom programme on the Syrian conflict

Kevin Stratford-Wright was a Lt-Colonel in the British Army till 2012, where his last position was as Head of Information Operations for the regional HQ in Afghanistan. From his LinkedIn page we have a description of an MoD StratCom programme between 2012 and 2015 that was "the UK’s largest of its kind since the Cold War", and has become "a template for activity elsewhere".

UK Ministry of Defence – Strategic Communications Programme Manager: June 2012 – June 2015 (3 years 1 month) London, United Kingdom

Established a Strategic Communications programme to support UK government policy in a conflict zone.

- Developed strategy and plans.*
- Engaged across the UK government (and internationally) to win support and approvals and to secure funding.*
- Developed Statements of Requirement in partnership with selected enabling-contractors.*
- Monitored and coordinated multiple project strands and reported on their activities and impact across UK government and to international partners.*
- Generated year on year efficiency savings through constructive engagement with enabling contractors.*
- The programme has been recognised as the UK's largest of its kind since the Cold War. Its approach has also recently become a template for activity elsewhere (accepted by both UK government and international partners).*

From the timing and scale of this StratCom programme, the "conflict zone" can only be Syria. In 2012 Stratford-Wright was [working](#) in the [Targeting and Information Operations](#) (TIO) unit of the Ministry of Defence that was renamed Military Strategic Effects in 2013. As Stratford-Wright noted, his approach has become "a template for activity elsewhere". One feature of the MoD's Syria StratCom operation has been the outsourcing, via the FCO and the Conflict Security and Stability Fund, of activities to "enabling contractors": companies or nonprofit foundations set up by former military officers. The media operation for the "moderate armed opposition" was [outsourced](#) in late 2013. Although the tender document was issued by the FCO, metadata reveal that it was created on Stratford-Wright's computer. The contract was eventually passed to a spin-out company named [InCoStrat](#) set up by Paul Tilley, another former Lt Colonel who had [worked with](#) Stratford-Wright in the MoD as a StratCom specialist. The White Helmets operation was set up by James Le Mesurier with funding from the Conflict Security and Stability Fund to Mayday Rescue, a nonprofit foundation registered in the Netherlands.

7 Operations in UK politics and media

7.0.1 Covert funding of academics

Monthly expenditure records for the Integrity Initiative over the period December 2015 to January 2016 show payments to two UK-based academics:

- Professor [Andrew Wilson](#) of UCL was paid £900 in March 2016 for his "Active Measures" [paper](#)
- Professor Julian Lindley-French was paid £285 for his [blog](#) "Speaking Truth unto Power". Lindley-French records that he is a member of the Chief of the Defence Staff's Strategic Advisory Panel – it is not clear whether members of this panel have to declare competing interests.

We have not been able to find any public disclosure of this funding. So far expenditure records have been released only for these four months: it is unlikely that these four months were the only period in which covert payments to UK academics were made.

7.1 UK journalists named in documents

- The Times – Deborah Haynes (now with Sky News), David Aaronovitch, Dominic Kennedy
- The Guardian – Natalie Nougayrede, Carole Cadwalladr

- The Economist – Edward Lucas
- FT – Neil Buckley
- BBC – Jonathan Marcus
- Paul Canning – blogger with a focus on Ukraine, who has contributed to *The Guardian*
- David Leask – Chief Reporter, *Herald Scotland*
- Borzhou Daragahi – *The Independent* – appears as the only individual listed under "Turkey" in the document [xcountry.pdf](#) that tabulates countries and election dates.

We have asked journalists listed in the documents whether they have had any contact with the Integrity Initiative. It may be relevant that the Integrity Initiative Handbook states that members of clusters are ‘to sign code of conduct & non-disclosure’.

Their responses can be grouped into four categories

7.1.1 *I know nothing*

- **David Aaronovitch** – When asked over Twitter whether he knew of or had had contact with Integrity Initiative, Institute for Statecraft or the UK Cluster, Aaronovitch replied

I have never heard of any of these three exotic entities. I think you have been hoaxed.

- **Jonathan Marcus** (BBC) – the BBC provided a statement to the Scottish Sunday Mail (print edition 16 December 2018) that

neither Marcus nor the BBC knew of the list of journalists, nor did he or the BBC consent to be part of any so-called cluster.

7.1.2 *I attended a meeting or was on an email list, but was not involved*

- **Borzou Daragahi:**

‘I do receive their emails’

‘it goes to my junk email account’

‘I systematically subscribe to think tank email newsletters’

7.1.3 *I am proud to be associated with them, there was nothing improper*

- **Edward Lucas** – has written a commentary with title [‘West is Once Again Failing the Test Set by Russian Aggression’](#), published on the Integrity Initiative website on 26 November 2018. In an [article](#) on RT on 23 November 2018, he was quoted as writing:

I have not been paid by the institute. But I applaud their work in dealing with the Chekist regime’s pernicious information and influence operations’]

He did not confirm or deny the existence of a network, responding to [questions](#) on Twitter with:

I don’t see why one lot of people have to explain being on lists compiled by another lot of people

- **David Leask** – has been open about working with the Integrity Initiative. He has published two articles quoting "a spokesman for the Integrity Initiative", one on [the visit of Andriy Parubiy](#) and one on [Russian media coverage of the Salisbury poisonings](#). He has [endorsed](#) the output of the twitter account [@initintegrity](#) and others associated with the Integrity Initiative such as Nimmo. He

responded to the release of documents with a [12 tweet thread on Twitter](#), acknowledging contact with the Integrity Initiative but denouncing Sputnik for "insinuation that I work for for or with a Nato/UK black ops".

Leask's [description](#) of the Integrity Initiative as "a network of researchers and journalists seeking to counter Russian propaganda and boost media literacy" confirms the existence of a network. In response to [further questions](#), Leask asserted that government funding of the Integrity Initiative was "hardly a secret". On this he was mistaken. The [official summary](#) of the Russian Language Programme does not list the recipient "implementing organizations" stating that "Information has been withheld from publication on security grounds". Although the government funding of £1.96 million for the Integrity Initiative in the current financial year is now a matter of public record following a [parliamentary question](#), this information was not in the public domain until the documents were released on 5 November 2018. The source of funding for the Integrity Initiative was not mentioned on its public website. It would have been possible for a diligent researcher to infer the total FCO spending on the Institute for Statecraft by going through the monthly expenditure tables for the FCO, but this would not have revealed the specific funding for the Integrity Initiative programme. The accounts filed at Companies House show FCO funding of £124,567 for the year ending 23 November 2017, but not the £1.96 million awarded for the current financial year.

The Integrity Initiative documents include notes of a meeting with Leask on 27 March 2018, allegedly taken by Guy Spindler, Chief Operating Officer of the Institute for Statecraft. The main focus of the interview is on Leask's assessment of the prospects for the Scottish independence movement. The meeting finishes with a briefing on the misuse of Scottish Limited Partnerships as vehicles for money-laundering, which Leask's own investigative reporting has helped to [expose](#). It is not clear whether he is aware of the unusual use of this business structure by the founders of the Institute for Statecraft.

7.1.4 No response or refusal to answer

- **Deborah Haynes** – no response.

Three of Haynes's stories between 2016 and 2018 can be linked to internal documents of the Integrity Initiative:

- For the visit of Ukrainian special forces officers organised by the Institute of Statecraft, a one-hour meeting with Haynes was scheduled at the Institute of Statecraft's office in 2 Temple Place on 11 July 2016. Haynes wrote a [story](#) based on this meeting that appeared in The Times on 11 August 2016. Haynes was the only journalist scheduled for a meeting with the Ukrainian officers: all their other meetings were with military officers except for one with the House of Commons Defence Committee.
- The draft application for MoD funding dated 20 March 2017 lists under "Success so far" (for the Integrity Initiative) the lead front-page [story](#) by Haynes in The Times on 17 December 2016 with title "Russia waging cyberwar against Britain".
- A document entitled "Representative selection of Integrity Initiative staff 2018 presentations and media interviews on Russian disinformation and malign influence" lists under the outputs of Victor Madeira a [report](#) in the Times on 9 March 2018 by Fiona Hamilton, David Brown and Deborah Haynes with the title "Spy mystery: Sergei Skripal's contact with MI6 in Spain suggests links to Litvinenko case". Victor Madeira is briefly quoted:

Victor Madeira, a senior fellow at the Institute for Statecraft in London, said yesterday that links with organised crime were entirely possible. Russia was a mafia state where organised crime and the authorities overlap, he said.

It may be relevant that Haynes is listed as an [honorary member](#) of the Pen & Sword club, whose main mission is "the promotion of media operations as a necessary and valued military skill in the 21st century." This may be an appropriate aspiration for military officers, but not for journalists. The club has 334 members, including Steve Tatham (listed in the UK cluster), Paul Tilley and the former BBC correspondent Mark Laity. Almost all other members have a military background or are NATO officials.

- **Dominic Kennedy** – In response to an email asking whether he had heard of or was involved with the Integrity Initiative, Kennedy stated that he had not read the leaked documents, but did not answer the question.

On 14 April 2018 Haynes and Kennedy launched an attack on members of the [Working Group on Syria Propaganda and Media](#) in the Times, including a front-page [article](#), a two-page spread and an anonymous editorial. Two members of the Working Group hold posts at the University of Edinburgh. Unable to find anything tying them to Russia, Kennedy attempted to [suggest](#) that the university was under Russian influence (based on a grant from the Russian cultural institute Russkiy Mir), and even that the city of Edinburgh was a base for Russian influence (based on the presence of Sputnik's office).

- **Neil Buckley** (FT) – No response when asked over Twitter whether he had had contact with the Integrity Initiative.
- **Carole Cadwalladr** – Identified in the third tranche of leaked documents as scheduled to talk at an event at the Frontline Club in early November 2018, [co-organised](#) by the Integrity Initiative and [Foreign Desk Ltd](#). She confirmed that she had spoken at the event and did not receive a fee, but did not answer a [question](#) on whether she had been involved with the Integrity Initiative or its parent the Institute for Statecraft.
- **Natalie Nougayrede** – No response when asked over Twitter if she was involved with the Integrity Initiative. She appears also in the French cluster list. In the same list, with a note that he is Nougayrede's partner, is Nicholas Roche, whose [current post](#) is Director of Strategy at the Directorate of Military Applications of the French Atomic Energy Commission. It may be relevant that in May 2013, when she was editor of Le Monde, Natalie Nougayrede had a [role in information operations in Syria](#). Under her direction, two Le Monde journalists acted as couriers to transfer samples provided by the opposition, allegedly from chemical attacks, to French intelligence agents in Jordan. Le Monde was then given the scoop of reporting that these samples had tested positive for sarin at the French chemical weapon detection lab at Le Bouchet.

7.2 Attempt to influence the House of Commons Defence Committee

Two of the Committee's Specialists – David Nicholas and Eleanor Scarnell — are listed in the UK Cluster. Two current members of the Committee — Julian Lewis, the chair and John Spellar — appear in the "NGW seminars invitation list" document, along with Scarnell and Nicholas. This suggests that the Integrity Initiative has attempted to influence this committee. Another indication of this is that [several members](#) of the Integrity Initiative team testified to the House of Commons Defence Committee between 1 March 2016 and 19 April 2016 on "Russia: implications for UK defence and security". For the visitors from the Ukrainian special forces, the Institute of Statecraft had scheduled a meeting with the Defence Committee on 12 July 2016.

7.3 Twitter account

Although the Twitter account [@initintegrity](#) accounts for only a very small proportion of the activity of the programme, it is relevant because unlike the covert activities of "networks" the output of the Twitter account is direct evidence that the programme is being used for partisan political purposes. Labour MPs and officials have [expressed outrage](#) that the Twitter account has been used to attack the Leader of the Opposition and his staff.

8 Links of the Integrity Initiative with extremism in the Baltic States and Ukraine

Some activities of the Integrity Initiative in the Baltic states and Ukraine, where people who consider themselves Russian make up large minorities, appear likely to foment sectarian hatred and civil conflict.

8.1 Holocaust revisionism

The Integrity Initiative works closely with the Lithuanian government and armed forces. The officially-encouraged spread of Holocaust revisionism in the Baltic States has been documented in detail by the magazine [Defending History](#). Lithuania and Latvia have passed laws that [limit discourse about the Holocaust in their territories](#) and deny the role of local helpers in the Nazi genocide. In Ukraine a [law passed in 2015](#) assigned officially protected status to the OUN and other organizations that collaborated with the Nazis and played a key role in the mass murder of Jews.

Both the [Lithuanian](#) and [Latvian](#) governments promote the [double genocide](#) version of Holocaust revisionism, which equates the (undisputed) political repression in the Baltic states during the years of Soviet rule to the genocide directed against the Jewish populations of those countries. In November 2010 the UK ambassador to Lithuania (Simon Butt) [drafted and sent a letter](#) to the the President of Lithuania, co-signed by the ambassadors of Estonia, Finland, France, Netherlands, Norway and Sweden, that expressed concern over the growing manifestations of antisemitism and denounced the "double genocide" version of history unequivocally:

Spurious attempts are made to equate the uniquely evil genocide of the Jews with Soviet crimes against Lithuania, which, though great in magnitude, cannot be regarded as equivalent in either their intention or result.

In May 2011 it was [announced](#) that Butt had retired from the Diplomatic Service (at the age of 53) and would be replaced as ambassador to Lithuania by David Hunt.

The Integrity Initiative documents report that Lithuanian armed forces have been training the British Army's 77th Brigade:

Lithuania has become particularly important in our network due to its expertise in dealing with Russian malign influence and disinformation. We currently have four centres of expertise in Lithuania. Since 2015 we have had a close link with the Lithuanian Armed Forces Stratcom team, currently drawing on their expertise, with the support of the Lithuanian Chief of Defence, to educate other national clusters on effective methodologies for tracking Russian activities. We initiated a link between this team and the UK 77 Bde, resulting in 77 Bde adopting the Lithuanian techniques.

8.2 Neo-Nazism

As documented above, the Integrity Initiative works closely with StopFake, which has downplayed or denied resurgence of Nazism in the Baltic states and Ukraine. For instance in this [article](#) StopFake defends military boot camps for children run by the [Azov Battalion](#). The Azov Battalion was founded in 2014, and its first commander was Andriy Biletsky, who previously headed the neo-Nazi group Patriot of Ukraine. The US Congress has [banned](#) the use of US aid for provision of "arms, training or other assistance to the Azov Battalion".

StopFake has [defended](#) Ukrainian parliamentary speaker Andriy Parubiy against French commentators who have denounced him as a Nazi. When Parubiy visited Scotland, David Leask, one of the journalists listed by Integrity Initiative on its social media team, [reported](#) in almost identical terms to the earlier StopFake defence of Parubiy following his visit to France that 'Parubiy is now "on the centre-right" in Ukrainian politics'. As the centre ground in Ukrainian politics is now aligned with policies that in most other European countries would be identified as those of the extreme right, it is difficult to dispute the assertion that Parubiy is on the centre-right in Ukrainian politics. A detailed [study](#) by Katchanovski (2015, updated 2018) has implicated Parubiy's group in what is now widely [held](#) to have been a false flag massacre of Maidan protesters on 20 February 2014.

9 Promotion of hate campaign against the Russian Orthodox Church in the Balkans

The Integrity Initiative [handbook](#) and the UK Cluster document list Victor Madeira as part of the Office Core Team with expertise on "Orthodox Church". The [slide presentation](#) that he prepared for a meeting at the University of Macedonia (Thessaloniki) on 12 November 2018 has the title "The Russian Orthodox Church: a State Tool of malign influence". The opening slide is a cartoon, that, with some substitution of religious identifiers, would not have been out of place in the pages of *Der Stürmer*. It shows the face of an Orthodox cleric as the front of a locomotive, holding what appears to be a purse. Other parts of the locomotive are labelled with dollar signs, a hammer and sickle, and the name Russkiy Mir (the Russian cultural foundation). A uniformed driver with rat-like features leans out of the engine room, which is labelled USSR.

Other passages in the documents emphasize the threat allegedly presented by the Russian Orthodox Church:

Savvidis's role is to prep the ground for the expansion of the Orthodox church in turn the expansion of Russian control over Greece. Persuading them they belong to the Eastern world, not the western.

The Orthodox religion is an important weapon which Russia is using. The Russian patriarch is trying to exceed the influence of the Greek patriarch. The Montenegrin church is trying to sabotage discussion of religion and security. Montenegro and other Balkan Orthodox religions look to Serbia and Russia, not to Greece.

The Integrity Initiative handbook lists one of the "topics for research" as "The Russian Orthodox Church and religion as weapons". The slide presentation and the quotes above make clear that the Russian Orthodox Church itself is viewed as the threat, and not just wealthy donors to the Church like the Greek-Russian businessman Ivan Savvidis.

Two individuals with current or past affiliation to the Catholic Bishops Conference of England and Wales (CBCEW), the governing body of the Catholic Church in England, appear in the UK Cluster document. [Dr David Ryall](#), Secretary of the International Affairs Department of the CBCEW, appears under "UK General – Inner Core – Military & Defence". [Primavera Quantrill](#), who held a post in the CBCEW from 2002 to 2005 and is now Partnerships Director at the Society for Promoting Christian Knowledge, appears under "Outer Core – Military & Defence". Although there is no evidence that these individuals were involved with the Integrity Initiative (Ryall reported receiving emails only, and Quantrill reported knowing nothing about them), it is of interest that those running the programme apparently sought to involve lay officials of the Catholic Church.

10 Activities of the Integrity Initiative in the US

One of the points apparently raised by the FCO's reviewers is as follows:-

US cluster update- what's been happening since the Q4 report? Who in the system are you engaging with at what level? (Obviously Todd has numerous contacts!)

The applicants' response began:

Todd has formally retired wef last week and will work in our team after the summer. He has provided access to the Global Engagement Centre

"Todd" appears to be Todd Leventhal. According to his LinkedIn profile, in May 2013 he left his post at the State Department's [Global Engagement Center](#) which is charged with "leading the U.S. government's efforts to counter propaganda and disinformation from international terrorist organizations and foreign countries". In August 2013, however, he took up a new post as Strategic Adviser at the Global Engagement Center. He is listed in the [Handbook](#) as a member of the Integrity Initiative Team.

The applicants' response continued:

Our application for 501c3 status as a US registered not for profit organisation is currently going through their IR process. We have a US (DC) office to work from. We are planning our US clusters (which will be in key states, not in DC). Within DC we are partnering with C N A and CEPA. Our first partners outside DC are Adventium Labs and the Technical Leadership Institute at the University of Minnesota.

This refers to a [conference workshop](#) at which the speakers include Chris Donnelly and Simon Bracey Lane. The applicants continued:

Via VUB we have access to Jakub Grygiel in the State Dept planning staff and are planning for a session with him this summer

The Smith Richardson Foundation will work with us on developing our US network when we have received the 501c3 status

We also have a contact to Katharine Gorka – Senior Advisor – US Department of Homeland Security

The Cluster roundup document notes that

The Integrity Initiative has the opportunity to develop the programme into North America, based on the Institute's subsidiary, the Institute for Statecraft and Governance, which has a simple office in DC and is in the course of registering as a US 501c3 not-for-profit organisation.

Despite the State Department's stipulation that none of the funding it provided for the Integrity Initiative should be spent in the US, it is clear that the Integrity Initiative is expanding its operations in the US with encouragement from the FCO and is working with US government officials in a manner that may not be entirely transparent to those who oversee them.

11 History of the Institute for Statecraft

11.1 Founding

The original company named [The Institute for Statecraft and Governance](#) was incorporated in Edinburgh in 2006, with Chris Donnelly and Dan Lafayeedney as co-founders. It was a non-profit company with a [memorandum of associations](#) listing the company's objects, which included "to advance education in the field of governance, ... to advance human rights, conflict resolution and/or reconciliation and religious/racial/ethnic harmony". The witness to their signatures on the articles of association was [Rosemary Cameron-Wanner](#), a NATO official based in the Public Diplomacy Division Media Operations Centre.

The Institute of Statecraft and Governance was apparently dormant until 2009 when it was [registered](#) as a Scottish charity. In 2010 there was an [event](#) at Wilton Park which gives the position of Anne Bader as Director

of North American Programs, Institute of Statecraft and Government, University of Oxford. So by 2010 it already had programs, and was based in Oxford though its corporate address was in Scotland.

On 16 June 2011 it filed accounts signed by Lafayeedney for the year ending 23 November 2010 as a dormant company, as it had done each year since it was founded. On 29 August 2012, however it filed amended accounts for the same period (year ending 23 November 2010), signed by Donnelly and showing total income for that period as £158,470, broken down as:

1. £96,500 for "Designated fund for capacity building for two eastern European governments
2. £61,970 for "Counselling, research, democracy promotion and implementation programme for NATO"

The amendment records that the accounts showing income of £158470 had been approved by the Board on 6 June 2011 and includes a preliminary statement that

The accounts have been revised in respect to which the original accounts did not comply with the requirement of the act and include any significant amendment made consequently after correcting the defects.

There is no explanation of these "defects" or why Lafayeedney had filed accounts for a dormant company on 16 June 2011, ten days after its Board had approved accounts for the same period showing annual income of £158,470.

The summary of accounts on the charity register records that total income for the financial year ending 23 Nov 2017 was £521,786. The accounts state that "The charity had no employees during 2016 or 2017". As the Integrity Initiative was launched in June 2016 and was highly active during this period, this implies that the office team were paid from other sources, and seconded to the Institute for Statecraft as a benefit in kind. Donnelly was paid £18000 for consultancy services over this period, and Szusterman £2000. No other trustees or staff received any emoluments from the charity.

On 13 April 2016 the registered address was changed from the Edinburgh office of the law firm Burness Paull, to Gateside Mills, a derelict building in rural Fife now being demolished. The current directors are Donnelly, Lafayeedney, and six others:

- **Anthony Cooke** – 21 directorships, occupation variously given as chartered accountant, ship broker and ship owner
- **Harry Hart**, resident in Switzerland – no other directorships. Son of David Hart, an adviser to Margaret Thatcher in the 1980s.
- **Philip Matthews** – sole director of PM Homeland Security and a former director of Astutus Intelligence (where Martin Dubbey is now sole director)
- **Oliver McTernan**, resident in France – former Catholic priest and co-founder of the conflict resolution charity [Forward Thinking](#) established in 2004. Chris Donnelly is a trustee of this charity. In 1992, while still a priest, McTernan founded a company named St Francis and St Sergius Trust Fund with objects including "advancement of religion within the territories of the former Soviet Union". In 2001 this was renamed Partners in Hope and in 2011 to the [Drive Forward Foundation](#), a charity "to empower care leavers aged 16-26 in London to achieve their full potential". A bio of McTernan on the World Economic Forum site gives more details of his career since 2000:-

Formerly, Senior Adviser, Club of Madrid. 2000-03, Visiting Fellow, Weatherhead Center for International Affairs, Harvard University. May 2002, initiated and participated in the first official high-level post conflict talks between NATO and the government in Belgrade [in 2002]; 25 years as Executive Committee Member, Pax Christi International, responsible for the movement's East-West Dialogue programme during the Soviet period.

- **Piroska Nagy-Mohacsi** – Programme Director of the Institute of Global Affairs at LSE where "she is responsible for various global policy initiatives on financial resilience, growth and migration". She does not appear in the Integrity Initiative documents though there is a reference to "the LSE team" in the 2018/19 application to the FCO, which appears to include Anne Applebaum and Peter Pomerantsev.
- **Dr Celia Szusterman** – 1986 doctorate at Oxford on Developmentalism and political change in Argentina, 1955-62. Listed in UK cluster

11.2 Youth work

The Shared Outcomes programme of the Institute of Statecraft appears to have originated in the work of the Active Change Foundation. [According to the Ministry of Defence](#), in the financial years 2016-17 and 2017-18 *the Armed Forces Covenant Fund Trust's Local Grants Programme awarded a total of £177,650 to 12 separate small projects run by the Shared Outcomes Programme, an initiative of the Institute for Statecraft which works with young people (aged 14-18) from minority communities in areas facing economic and social challenge and aims to increase participants' life opportunities and support them in fulfilling their potential. The Shared Outcomes projects enable young people to take part in challenging activities such as assault courses, night navigation exercises and camping while visiting an Army base, and other activities designed to improve community cohesion.*

The Institute for Statecraft's website [describes](#) this charitable programme run by the Institute for Statecraft as follows:

We work with young people (aged 14-18) from minority communities in areas facing economic and social challenge. Our aim is to increase participants' life opportunities and support them in fulfilling their potential. We achieve our objectives through offering activities that develop employability skills, provide accredited qualifications and build confidence.

These activities include two-night Challenge Weekends at an Army base, two-day team-building exercises and Duke of Edinburgh Award programmes alongside the Army Cadet Force. The Directors' Reports make clear that this programme is targeted specifically at Muslims. This [newsletter](#) from a school in Stepney describes a two-day trip for 30 pupils to an army camp with Shared Outcomes.

11.3 EU lobbying

The Institute of Statecraft declared two people at 0.25 FTE each for the year 2016, with annual cost given as £17,500 approximately.

12 Christopher Nigel Donnelly

There is a profile of Chris Donnelly on the [Commonwealth Argosy site](#).

As a graduate of Manchester University and reserve officer in the British Army Intelligence Corps, Chris Donnelly helped to establish, and later headed, the British Army's Soviet Studies Research Centre at RMA Sandhurst. Between 1989-2003, as Special Adviser to four NATO Secretaries

General, he was closely involved in dealing with the disintegration of the Soviet Union and the reform of the newly emerging democracies in Central and Eastern Europe. He left NATO in 2003 to set up and run the UK Defence Academy's Advanced Research and Assessment Group. In 2010 he became co-Director of The Institute for Statecraft dealing with new security threats and responses – specifically, new forms of conflict and warfare and how to transform institutions so that they are fit for today's rapidly changing security environment.

He also: is adviser to the Foreign Minister of Lithuania; is a Security and Justice Senior Mentor in the UK's Stabilisation Unit; is Trustee of the London-based charities Active Change Foundation and Forward Thinking; serves as Honorary Colonel, SGMI

The Soviet Studies Research Centre was founded in 1972 at Sandhurst. After the end of the Cold War, it became the [Conflict Studies Research Centre](#), which became part of the [Advanced Research and Assessment Group](#) of the Defence Academy, which in turn was renamed the Research and Assessments Branch and wound up in 2010 after a number of internal disagreements. Many of those now working in the Institute of Statecraft have worked previously with Donnelly in the Advanced Research and Assessment Group.

Donnelly's salary cost as director of the Integrity Initiative is £72,6000 per year in the budget for 2018.

12.1 Military intelligence role

Donnelly has had a series of commissions as reservist in the Intelligence Corps stretching back to 1970, when he was [commissioned](#) as 2nd Lt on probation in the TA reserve of the Intelligence Corps. These have all been in the reserves and appear to have run concurrently with his other roles including for example his work at NATO. Donnelly's honorary colonel affiliation to SGMI began in 2015, the same year that the Integrity Initiative programme started. The Gazette gives two different dates for this appointment.

- [Mr Christopher Nigel DONNELLY CMG TD](#) is appointed Honorary Colonel Specialist Group Military Intelligence Army Reserve 1 May 2015 in a new appointment [Published 7 July 2015]
- [C. N. DONNELLY CMG TD](#) Honorary Colonel Specialist Group Military Intelligence Army Reserve from 1 January 2015 and is granted the rank of Local Colonel for the duration of the appointment (Belated Entry). [Published 11 October 2016]

13 Daniel Lafayeedney

It appears that his surname was originally Edney, and that he took the middle name Lafaye on marriage to his first wife Regine Lafaye, some time before October 1978 when as Daniel Lafaye Edney aged 32 years, he was [commissioned](#) into the Territorial Reserve Special Air Service Regiment, Group A (23 SAS) as 2nd Lt. on probation. 19 months later, still holding the rank of 2nd Lt on probation and now known as Daniel Lafaye-Edney, he [resigned his commission](#). Although there is no record in the Gazette of any further military service or promotion, in 2004 he [appears](#) in the St Antony's College Record as "Major Daniel Lafayeedney".

23 SAS was formed as a Territorial Army (part-time military reservists) unit in 1959 by renaming the Reserve Reconnaissance Unit, which had in turn been formed from MI9, a unit with expertise in escape and evasion during the Second World War. It is now, like Specialist Group Military Intelligence, part of the [1st Intelligence, Surveillance and Reconnaissance Brigade](#).

Some time before March 1996 Lafayeedney appears to have formed a relationship with Fiona Katherine Adelaide Gatty, who is [listed in an online directory of the peerage](#) as the mother of Lafayeedney's youngest son born in December 1996. Fiona Gatty [describes herself](#) as "an Art Historian specialising in late 18th- and early 19th-century French aesthetics with an extensive finance and business background in the high net worth family business and entrepreneurial sector." She holds a post-doctoral research fellow post in Somerville College Oxford and is Program Officer for the Templeton World Charity Foundation. Lafayeedney and other members

of his family have over the years held directorships of the [property company](#) set up in 2001 that owns the Gateside Mills site. Of the two current directors, one is Fiona Gatty who holds 19% of the equity.

13.1 High Court case in 2006

Lafayeedney's business activities as a property developer led to an acrimonious case which [came before the High Court in 2006](#) in which he attempted to deny the claim of Mr Garry Bramley that there was a written agreement on a 50/50 split of the profits on a property deal for which Bramley had lent Lafayeedney £350,000. The judge made adverse comments on Lafayeedney's testimony:

there were certain specific matters, identified in Section B2 below, where I am bound to conclude that Mr Lafayeedney was not telling me the truth.

The judge commented with evident distaste on the business model for Lafayeedney's property deals:

However it appears that the real profit was made from the complex inter-company arrangements, whereby it was the off-shore vehicle that sold the site to the Housing Association, thus sheltering the profit on the sale from any liability to Capital Gains Tax.

This had led to an Inland Revenue investigation into Lafayeedney's affairs in 2004. The judge commented unfavourably on the character of both men:

In my judgement, it was entirely in character that each man, during their oral evidence, made allegations or insinuations of criminal conduct on the part of the other. For example, Mr Bramley alleged that, at one meeting Mr Lafayeedney explored with him the possibility of an innocent third party taking the consequences of the Inland Revenue investigation, whilst, for his part, Mr Lafayeedney said that Mr Bramley told him that he had not paid tax in 16 years.

In the same year (2006), he was described as a Scottish 'multi-millionaire property developer', in an [account](#) of his daughter's marriage to Lord Seymour, heir to the Duke of Somerset.

14 Other companies directed by Donnelly and Lafayeedney

Donnelly and Lafayeedney share directorships in other companies. Some of these companies have filed dormant accounts but appear to have been active. These include several Scottish Limited Liability Partnerships (LLPs). Scottish Limited Partnerships (SLPs) are different to Limited Partnerships in England and Wales: a registered Scottish Limited Partnership can hold assets in its own name, as well as owning assets, entering into contracts, borrowing money and owning property. A Scottish Limited Liability Partnership (LLP) differs from an SLP in that each partner is afforded limited liability protection against any debts, losses or lawsuits as a result of malpractice. Although the ability to manage the business as a partnership means that any agreement between members does not have to be disclosed publicly, the LLP is required to publish annual accounts. Scottish general partnerships have a separate legal personality, but partners are jointly and severally liable to creditors for all the partnership's debts.

Although SLPs and Scottish LLPs can be set up only in Scotland, they are regulated by UK law and the Scottish Government has no powers to regulate them. A [press release](#) from the Department for Business, Energy and Industrial Strategy on 12 April 2018 noted that although Scottish Limited Partnerships are used by legitimate businesses, there was "growing evidence SLPs have been exploited in complex money laundering schemes". The Business Minister Andrew Griffiths was quoted as saying that although the UK has taken a

leading role in the fight against money laundering, "Scottish Limited Partnerships are being abused to carry out all manner of crimes abroad – from foreign money laundering to arms dealing." Other [investigations](#) have documented that Scottish Limited Partnerships carried out such activities even when they were filing accounts as dormant companies.

The companies in which Lafayeedney and Donnelly have been involved include:

14.1 Pluscarden Investments LLP (2005-2010)

[Pluscarden Investments LLP](#) was registered in Glasgow as a Scottish LLP on 12 October 2005 with Daniel Lafayeedney and Fiona Gatty as directors, and dissolved on 19 February 2010. This LLP does not appear on the Companies House register but can be found by searching www.duedil.com. The establishment of this company may be related to the Pluscarden Programme at Oxford over the same time period, for which these two individuals donated funds to St Antony's College. Fiona Gatty mentions on her CV her role in what may be an earlier company with a similar name: "Pluscarden Investments – Self Employed Corporate Finance Business Partner (May 1995 – April 2007)". Pluscarden Abbey is a Benedictine monastery on the Moray Firth in north-east Scotland.

14.2 ISG Corporate LLP and ISG Corporate Limited (2009 to present)

ISG Corporate LLP was incorporated in Glasgow as a Limited Liability Partnership (LLP) on 19 August 2009, with the office of the law firm Burness LLP as registered address. The two founding Designated Members of ISG Corporate LLP were partnerships with registered address as Gateside Mills: Pluscarden Associates Partnership and Pluscarden Investments Partnership. These entities are presumably Scottish general partnerships as they are not listed as companies. Accounts for the LLP as a dormant company were filed for the years ending 31 August 2010 and 31 August 2011. On these filed accounts, the signature for Pluscarden Associates Partnership is that of Chris Donnelly and the signature for Pluscarden Investments Partnership is that of Pierre Lafayeedney, Daniel Lafayeedney's second son. On 30 December 2011 ISG Corporate LLP was renamed to Innovation Services General LLP and a new limited company (not an LLP) was formed with the name ISG Corporate Limited, with Donnelly and Daniel Lafayeedney's eldest son Jean-Louis Lafayeedney each holding half the equity. Innovation Services General LLP filed accounts for a dormant company until it was dissolved on 1 February 2013. ISG Corporate Limited is still active with registered address as Gateside Mills, having filed accounts for a dormant company for every year since it was incorporated.

Until 18 January 2011 the company name of what is now the Institute for Statecraft was The Institute for Statecraft and Governance for which the acronym ISG was used in the report of its partner charity Active Change Foundation (Figure 1). From 19 August 2009 when ISG Corporate LLP was founded, the name of this LLP could easily have been confused with this acronym for the charity Institute of Statecraft and Governance. This may explain why the name of the Institute for Statecraft and Governance was changed to the Institute for Statecraft on 18 January 2011, and why ISG Corporate LLP was later renamed to Innovation Services General LLP.

14.3 Council on Foreign Relations LLP (2010 to present)

A company named [Council on Foreign Relations](#) was incorporated as a Scottish LLP in February 2010, five months after the Institute was registered as a Scottish charity. The Scottish LLP has filed accounts as a dormant company since it was set up in 2010. Its registered address is the derelict Gateside Mills building, same as the Institute for Statecraft. The three current directors are Chris Donnelly, Daniel Lafayeedney and Jean-Louis Lafayeedney (Daniel's 38-year old son by his first marriage, now based in Hong Kong). Oliver McTernan (see above) and Lesley Simm were directors from 2010 to 2013. Simm, now retired, was a [civil servant](#) at the

Defence Academy's Advanced Research and Assessment Group with a specialism in Islamist movements. This Scottish LLP has the same name as the [US think-tank](#) CFR founded in 1921, but has no connection with it (confirmed to us by CFR's General Counsel).

14.4 Techfin London Limited (2014-2016)

Techfin London Limited was incorporated in August 2014 with Donnelly and Lafayeedney as two of five directors. It filed no accounts, leading to compulsory strike-off in March 2016

15 St Antony's College Oxford and the Pluscarden Programme for the Study of Global Terrorism and Intelligence

On the [current website](#) of St. Antony's College Oxford, Lafayeedney is listed as a 'benefactor.'

The co-founder and Director of The Institute for Statecraft, has wide experience in international affairs, working with both the UK and foreign Governments. As Senior Associate Fellow at the Advanced Research and Assessment Group at the Defence Academy of the UK (2004- 2010) he specialised in the development and implementation of capacity-building projects for high-level governance of the security sector in European and middle-Eastern countries, and in supporting the development of counter-radicalisation programmes for at-risk ethnic communities in the UK. His military service, legal background and career as an entrepreneur have given him an understanding of the importance of the link between business and national security.

He is a Senior Member, St Antony's College, University of Oxford, Member of The Law Society of Scotland holds a degree in Scots Law from the University of Aberdeen and a Diploma in International Comparative Law from San Diego University, USA.

His position from 2004 as Senior Associate Fellow at ARAG would have put him close to Donnelly, who had set it up.

From enquiries among those involved we have established that the funding for the Pluscarden Programme was donated by Daniel Lafayeedney and Fiona Gatty. Daniel Lafayeedney was on the [Management Committee](#), though in the College Record he does not appear as Director as is stated in his biographic sketch on the College website. Fiona Gatty (under her married name MacLeod) appears on the Advisory Committee. On her CV she lists her role in the Pluscarden programme as co-founder and member of Advisory Committee as from 2004 to 2013.

As the Inland Revenue had begun an investigation into Lafayeedney in 2004, this might not have been the best time for him to make a substantial donation to an Oxford college. The [Pluscarden Programme for the Study of Global Terrorism and Intelligence](#) began in 2005. The academic director was Steve Tsang, a China specialist. A [report](#) of its first year of operation is available in the St Antony's College record. The level of activity of the Pluscarden Programme appears to have been modest: during its first year it held [two seminars per term and a large international workshop in December](#) Delegates had to pay a £400 registration fee for the workshop. The first annual Pluscarden conference was designated by NATO as one of its Advanced Research Workshops, entitled 'The Changing Face of Intelligence' held over two days in December 2005.

Pluscarden's meetings during its first year included three Israelis with an academic or military background as speakers or session chairs: Professor Yoram Dinstein, General Yaa'cov Amidor, Professor Itzik Ben-Israel. Lafayeedney attended the Herzliya Conference in Israel on 21-24 January 2007, and his [affiliation](#) was given as

BICOM (Britain Israel Communications and Research Centre), an [active pro-Israeli lobbying group](#) underwritten by [Chaim "Poju" Zabłudowicz](#), a London-based property developer. The attendance list also included Donnelly and Zabłudowicz. Other than a [document from the Italian Senate](#) dated 2017 that links the Institute of Statecraft with the Herzliya Institute of Counter-Terrorism in a NATO-supported research project, there is no other evidence that Lafayeedney or Donnelly were supporters of pro-Israeli organizations.

16 Charities with Donnelly and Lafayeedney as trustees

16.1 Forward Thinking

Founded by Oliver McTernan in 2004, Chris Donnelly is one of six trustees. Its stated aims are:-

To promote a more inclusive peace process in the Middle East. To facilitate political dialogues in, and between, the Arab/Muslim and Western worlds. To promote in the UK greater understanding and confidence between the diverse grassroots Muslim communities and the wider society including the Media and the British establishment.

Yusuf Desai, listed as UK programme regional director for Forward Thinking, is listed as a Fellow in the Office Core Team of the UK Cluster of the Integrity Initiative and as a [Senior Fellow](#) at the Institute For Statecraft.

16.2 Active Change Foundation

Active Change Foundation was incorporated in 2006 and based in Walthamstow, with a [Memorandum of Association](#) listing five specific "objects for which the Company is established": to provide diversionary projects to excluded young people, to promote integration, cohesion and tolerance, to train and facilitate employment prospects for disenfranchised young people, to promote and provide healthier life style within the minority ethnic community, and to provide help and education and other facilities to youngsters in order to reduce crime. Donnelly was appointed as a director on 3 June 2008: from enquiries among those working there we have established that it was Oliver McTernan who introduced Donnelly to the Active Change Foundation. On 9 September 2008 a special resolution was passed, [amending](#) the Memorandum of Association to include prevention of terrorism as one of the principal objects of the charity. This appears to have made it possible to access new sources of funding. Donnelly subsequently brought three other Defence Academy alumni into Active Change foundation as executives or directors: [Lesley Simm](#) who was listed as Chief Executive in 2010-11, Dan Lafayeedney as director in 2014, and [David Gilbertson](#), former [deputy assistant commissioner at the Metropolitan police](#), as director in 2015. The five trustees in 2016 [included](#) Chris Donnelly, David Gilbertson and Dan Lafayeedney. In October 2017 all three of these resigned or retired as trustees.

The accounts for Active Change Foundation on the Companies House site are uninformative, including only an end of year balance sheet and not even totals for income and expenditure. More information is available in the Trustees' reports and accounts filed with the Charity Commission. Reports from before 2013 are not available online, and the reports that are available online from 2013 onwards do not give a breakdown of income. We have access to original printed reports. Home Office funding from the Office for Security and Counter-Terrorism began in the year ending 31 January 2009, reaching a peak in 2009-2010 when total income was £467,148 and the Home Office was the principal source of financial support. From the FCO, the Active Change Foundation received £162,410 in 2011-2012 and £402,578 in 2013.

In their report for 2008-2009, the Trustees reported that partnerships had been formed with the Defence Academy, the Ministry of Defence, the Institute for Statecraft and Governance, the Advanced Research and Assessment Group, and the Atlantic Council. In the list of partners the acronym ISG is used for the Institute of Statecraft and Governance (Figure 1).

17 Charitable status of the Institute of Statecraft

17.1 Publicly declared charitable purposes and privately stated objectives

The Institute for Statecraft is [registered](#) as a Scottish charity. The charitable objects in the constitution are stated as follows:

- 1. To advance education in the fields of governance and statecraft, and in particular focussing on the leadership, direction, management and administration of public and private institutions, major organisations and other bodies (whether incorporated or otherwise), and the skills needed by those in authority within such institutions, organisations or bodies to enable them to deal effectively with current and future challenges particularly in respect of security*
- 2. To advance human rights, conflict resolution and/or reconciliation and religious/racial/ethnic harmony, to promote equality and diversity, citizenship and community development, and to advance national and international security; and in particular through assisting governments (including emerging democracies and countries in transition) and other institutions, organisations or bodies (whether in the UK or abroad) to respond to the challenges posed by new developments in the world (whether social, political, economic or technological) and to develop and embed structures and institutions that reflect principles of best practice in governance and statecraft.*

The [statement](#) released in response to the November 2018 leak says that the Integrity Initiative is set up to "counter disinformation by states and sub-state actors."

The Integrity Initiative is a partnership of several independent institutions led by The Institute for Statecraft. This international public programme was set up in 2015 to counter disinformation and other forms of malign influence being conducted by states and sub-state actors seeking to interfere in democratic processes and to undermine public confidence in national political institutions

This might be a charitable purpose if it included disinformation by all states including our own. But the internal handbook and the grant make clear that the Integrity Initiative is directed at Russia only.

The Integrity Initiative was set up in autumn 2015 by The Institute for Statecraft in cooperation with the Free University of Brussels (VUB) to bring to the attention of politicians, policy-makers, opinion leaders and other interested parties the threat posed by Russia to democratic institutions in the United Kingdom, across Europe and North America.

The 2017-2018 [application form](#) also states that the programme is specifically directed against Russia:

To counter Russian disinformation and malign influence in Europe by: expanding the knowledge base; harnessing existing expertise, and; establishing a network of networks of experts, opinion

formers and policy makers, to educate national audiences in the threat and to help build national capacities to counter it.

The activities of the Integrity Initiative in Ukraine and the Baltic States seem directed at conflict promotion rather than conflict resolution.

The [applicants' response to the FCO's reviewers](#) shows that the Integrity Initiative is under close supervision from the FCO. The applicants begin with a summary of the "top three deliverables for FCO". This implies a customer-contractor relationship which calls into question the independence of the Institute of Statecraft – charities are supposed to act independently of government influence. The top three "deliverables" are listed as:-
Developing and proving the cluster concept and methodology

- *lists "Jelena Milic silencing pro-kremlin voices on Serbian TV" as an example*

Making people (in Government, think tanks, military, journalists) see the big picture, making people acknowledge that we are under concerted, deliberate hybrid attack by Russia

Increasing the speed of response, mobilising the network to activism in pursuit of the "golden minute"

- *lists "Recent example from Spain of our influencing the appointment of the pro-Kremlin candidate within a few hours of the announcement"*

Silencing dissenters and blocking their appointment to public posts are not charitable purposes.

17.2 Office of the Scottish Charity Regulator's criteria for making a complaint:

The criteria listed on the website are:

Charities that are being used for private gain

Where a charity's independence is being called into question. We expect charity trustees to act independently of any private, government or political interest

When it is not clear who is in charge of the charity. For example: one charity trustee seems to be in overall control of the charity, an employee seems to be in overall control of the charity, or none of the charity trustees is taking responsibility – this can result in serious governance problems, which could harm the charity

When it appears that the charity's assets are at risk or not being used for charitable purposes

The charity is not carrying out the charitable purposes defined in its governing document

The Integrity initiative, which accounts for most of the Institute for Statecraft's budget, raises concerns on these criteria:

- it is not acting independently of government and political interests. Key personnel, including the director, have honorary or reservist posts in military intelligence units. It is open to question whether a

military intelligence officer, even a part-time one, can ever be off duty. It appears that office space, and at least some of the staff are being provided as benefit in kind by an unknown agency.

- there are governance problems: the registered office is a derelict building. Donnelly and Lafayeedney seem to be in overall control of the charity and they have a non-transparent business relationship through their Scottish Limited Liability Partnerships.
- the charity's assets are not being used for charitable purposes
- the charity is not carrying out the charitable purposes listed in its governing document

Acknowledgements

We thank David Habakkuk for historical background, Max Blumenthal for pointing us to sources on Ukraine and David Scott for visiting the Gateside Mills site.

Appendix – list of documents released up to 20 December 2018

First tranche released 5 November 2018

17.2.1 UK-related documents

1. [FCO application form 2017-18](#) Signed by Chris Donnelly, dated 27 April 2017.
2. [FCO application 2018 v2](#) Also signed by Chris Donnelly, also dated 27 April 2017 but presumably submitted in 2018.
3. [FCO proposal integrity budget 2017-18](#)
4. [Integrity 2018 Activity Budget v3](#) Quarterly budget projection for 2018-19.
5. [Top three deliverables for FCO](#) This appears to be the applicants' response to reviewers' comments on the grant application for 2018-19. The date can be inferred to be close to 8 June 2018.
6. [II handbook v2](#) of the Integrity Initiative dated 30 May 2018.
7. [The Integrity Initiative Guide to Countering Russian Disinformation May 2018](#)
8. [Cluster Roundup Jul18](#) Progress report on establishing national clusters.
9. [Cluster Leaders](#)
10. [Cluster Participants](#) List of all cluster participants
11. [xcountry](#) Table of countries with election dates, institutions, and individuals associated with the Integrity Initiative.
12. [Moncloa campaign](#) apparently dated 8 June 2018 and submitted as supporting material with the applicants' response to FCO reviewers. Timeline of social media output during Integrity Initiative's successful campaign to block the appointment of Colonel Pedro Baños Bajo to the post of head of the National Security Directorate of Spain. Includes a list of seven individuals under the heading "UK II team Twitter impact: Influential Individuals Social Media activity".
13. [UK Cluster](#)

17.2.2 Other regional / national clusters

14. [Austria cluster](#)
15. [Baltics Cluster](#)
16. [Central Eastern Cluster](#)

17. [France Cluster](#)
18. [Germany Cluster](#)
19. [Greece Cluster](#)
20. [Italy Cluster](#)
21. [Netherlands Cluster](#)
22. [Nordic Clusters](#)
23. [Spain Cluster](#)
24. [USA & Canada Cluster](#)

A file named **xOutreach** contains only a single record, for Marcel R. D. Chirwa who is Permanent Representative for Malawi to the UN office in Nairobi.

Second tranche of documents released 29 November 2018

17.2.3 Germany

- [THE GERMAN CLUSTER – INTERIM REPORT](#) By Hannes Adomeit 03/10/2018
- [Harold Elletson’s paper \(in German\)](#)
- [Elletson’s paper \(in English\)](#)
- [Domestic Determinants of Russia’s anti-Western Campaign](#)
- [Claim for reimbursement](#)

17.2.4 Spain

- [Cluster breakdown](#)
- [Consultancy agreement with Nico de Pedro](#)
- [Invoice to the Spanish CIDOB research centre](#) from its British supervisors
- [Why is it so difficult to address the Russia issue in Spain](#) – Manual for campaigns in Spain
- [Framing Russian meddling in the Catalan question](#) October, 2017

17.2.5 Greece

- [Simon Bracey Lane’s report on trip to the Balkans](#)
- [Greece cluster enlistment in Thessaloniki](#)
- [Contract with the second Greece cluster](#)
- [Cluster meeting schedule in Thessaloniki](#)
- [Covert meeting of cluster members at Sissy Alonistiotou’s house in Athens](#)
- [Cluster report](#) on preparing a desirable reaction to the expulsion of diplomats
- [Mark Voyger’s ‘Russian lawfare’ slides for the cluster meeting in Thessaloniki](#)
- Greece cluster requests for funds from the UK center: [proposal 1](#) and [proposal 2](#)
- [Cluster’s review of media coverage of Salisbury poisonings](#)
- [HUB 2017 Greece](#) – Cluster listing.
- [Cluster research on alleged agents of Russian influence in Greece](#)
- [Victor Madeira’s slides for his presentation at the Thessaloniki meeting](#)

Third tranche released 13 December 2018

- Integrity Initiative [monthly expenditure for December 2015 to March 2016](#).
- [Production timetable March-April 2016](#), dated 25 February 2016
- [Production timetable March–June 2016](#), dated 5 April 2016
- [Draft of application to MoD for funding](#), dated 14 March 2017. This appears to be based on preliminary discussions with the MoD, as there is a passage that appears to quote a communication from the MoD:

How much money are you asking for this project? (Different amounts for different levels of project is fine, but we need specifics on how much for what. Is there funding from other sources? What about long-term)

In this draft one of the performance indicators is "Tougher stance in government policy towards Russia".

- [Twitter performance report January 2018](#)
- [Twitter performance report April 2018](#)
- "Ideas for Ramping up IfS Contributions to the Cause" – [memorandum](#) by Victor Madeira, dated 16 March 2018. One suggestion is "Find ways to remove e.g. RT/Ruptly video and infographic content from mainstream media e.g. newspaper websites, YouTube, Twitter, Facebook, etc."
- [Integrity Initiative staff 2018 presentations and media interviews](#) on Russian disinformation and malign influence" – covers January to March 2018
- [Agenda](#) for seminars on 27th and 28 February 2018 with Center for New Generation Warfare
- [Invitation list](#) for these seminars
- [Lists of Temple Place Resident Team and Specialist Team](#) – can be dated to June-July 2018
- [Draft agenda](#) for conference "Tackling Tools of Malign Influence" at Frontline Club on 1-2 November 2018

17.2.6 Visits by Ukrainian officers

- [Schedule](#) for visit of five Ukrainian officers to the UK, dated 11 July 2016. In this document they are described as "reserve officers" but in the draft application to the MoD they are described as "a Ukrainian Special Forces team". The draft application states that

in a series of meetings with their UK counterparts they passed on invaluable information about how they are dealing with Russian military operations in Eastern Ukraine.

In [interviews](#) conducted in the summer of 2016, Ukrainian special forces personnel described their operations behind enemy lines in the separatist-controlled Donbass region, including targeted killings and destruction of infrastructure.

- [Invoice](#) from Institute of Statecraft to MoD for visit of 2 Ukrainian officers dated 22 November 2017

17.2.7 Documents related to the Salisbury poisonings

- [Russian Lies and the Skripal Case](#) – Stephen Dalziel, dated 10 March 2018
- [Sergei Skripal Affair: what if Russia is responsible?](#) – assumes that the attack is attributable to Russia – dated 11 March 2018 from filename
- [Social media investigation and monitoring proposal](#) – a costed proposal prepared by Greg Rowett, dated 15 March 2018
- [Article](#) by Ana Alonson from El Independiente, Madrid, 18 March 2018, with input from Stephen Dalziel
- [Report for FCO 16 March 2018](#)
- [Roundup](#) of coverage of Skripal case on 20 March 2018: expresses concern about how a letter to The Times on 16 March 2013 from Dr Stephen Davies (A & E consultant at Salisbury District Hospital) "is being used". A saved copy of the GMC registration record of Dr Davies, accessed on 20 March 2018, is also included in the documents.
- [Report for FCO 23 March 2018 by Chris Heron](#) – expresses concern that Dr Davies's letter "is still getting play". Heron also comments that "The line about the Skripals probably having "limited mental capacity" after the attack seems to have got good traction". This links to a Reuters [report](#) of the judgement in the Court of Protection in which the judge [noted](#) that

The precise effect of their exposure on their long term health remains unclear albeit medical tests indicate that their mental capacity might be compromised to an unknown and so far unascertained degree.

- [Report for FCO 24 March 2018](#)
- [Report for FCO 30 March 2018](#)
- [Notes on coverage in the Baltic States](#), dated 18 March 2018
- [Roundup of social media coverage](#) dated 21 March 2018
- [Roundup of coverage across the Integrity Initiative network](#), dated 10 September 2018
- [Skripal case coverage in Italy](#)
- [Flyer](#) for a one-day training program "Discernment in Action" based on the Skripal case

17.2.7.1 List of names with email addresses

The file [CND Gen List 2](#) is a list of 22 names with email addresses. Most of these individuals have no other connection with the Institute for Statecraft or the Integrity Initiative. The presence on this list of Pablo Miller and Howard Body suggests that this is a list for email updates or consultations on the Salisbury poisonings story.

- Current military / MoD
 - [Colonel Angus Taverner](#) – director of MoD’s news media operations policy during the Iraq war, subsequently enrolled for a master’s degree in public relations.
 - Lt Col Annabelle Janes – CO Land Intelligence Fusion Centre
 - Lt Col Debi Lomax – Chief of General Staff’s Commander’s Initiative Group
 - Captain [Joe Walker-Cousins](#), reservist in Specialist Group Military Intelligence and employed by KBR in Saudi Arabia (see later)
 - [Howard Body](#) – Principal Analyst and Assistant Head Science Support, Defence Science and Technology Laboratory, Porton Down. "Analyst" presumably refers to strategic rather than laboratory analysis, as he has no science background and gave a [presentation](#) on "stabilisation operations" in 2005.
 - Ian Cohen – has both army and HSBC corporate emails – name matches HSBC’s Global Asset Management managing director
- FCO – [Adam Rutland](#), Communications and Engagement Department.
- US Embassy – [Zachary Harkenrider](#), Counselor for Political Affairs
- Hudson Institute – [Craig Kennedy](#), Senior Fellow and past president of the German Marshall Fund
- Journalists
 - [Helen Boaden](#) – former Director of BBC news
 - [Isabel Oakeshott](#) – now writing a book about the state of the army
- Chatham House
 - [Duncan Allan](#) – former FCO Eastern Research Group.
 - [Mathieu Boulegue](#) – Research Fellow, expertise on Russia
- Risk/security/intelligence consultants
 - [Paul Harkness](#) – formerly Brigadier at Army Headquarters, now sole director of Hawk Consultancy
 - [Pablo Miller](#) – formerly Sergei Skripal’s MI6 handler, now Orbis Business Intelligence according to his [deleted](#) LinkedIn profile.
 - [Neil Barnett](#) – former journalist, now runs a risk consultancy named Istok Associates
 - [Paddy Nicoll](#) – served in Black Watch till 1996, and was director of [Rubicon International](#) till 2005.
- Institute for Statecraft trustees
 - [Harry Hart](#) – property investor
 - [Philip Matthews](#) – former director of Astutus Intelligence, current director of PM Homeland Security
- Academic – Professor [James Gow](#), KCL Department of War Studies

- Unidentified affiliations
 - William Bortrick – registered domain britishexperience.com in 2004, possible match to editor of Burke's peerage
 - [Alexander Patterson](#) – sole director of Talisman ADC

17.2.8 Invoices to Institute of Statecraft

- [Invoice from Keir Giles](#), Conflict Studies Research Centre, dated 2 March 2017
- [Invoice for set up of cluster in Jordan](#) dated 15 April 2018
- [Invoice for £5000 from Ben Nimmo](#) for work in August 2016
- [Invoice from Bruce Jones](#) for Public Affairs Consultancy dated 7 April 2017
- [Invoice from James Sherr](#) for "Contribution for Integrity Initiative" dated 4 December 2017
- [Invoice for £12,000 from Harod Associates for "Specialist Consultancy Services as agreed with Guy Spindler"](#)

17.2.9 Donnelly documents

- Donnelly's [memorandum](#) on post-Brexit policy
- Donnelly's [curriculum vitae](#)
- Donnelly's proposed [military measures](#) for Ukraine to regain Crimea, dated 1 March 2014 (two days after Russian special forces had taken control of key points)
- Donnelly's [notes](#) of a private discussion with General Sir Richard Barrons (retired as Joint Forces Commander in 2013) –

17.2.10 Scotland

- [Notes of a meeting with David Leask](#), allegedly made by Guy Spindler

17.2.11 France

- [Extended list of French cluster members](#)
- French cluster leader's contracted [article](#) and earlier [draft](#)
 - [payment for this article](#)
- another example of a [contracted article](#)
- [Donnelly's meetings in Paris](#)
- [Johanna Möhring's meetings in Paris](#)
- [Avisa Partners presentation](#)
- [Avisa's proposal for a programme to combat Russian disinformation](#)

17.2.12 Italy

- Italian cluster leader's [report](#)
- [Invoice for work in Italy](#)