|  |  |
| --- | --- |
| Home Office | Bribery and corruption assessment template |

The Government published the first [UK Anti-Corruption Plan](https://www.gov.uk/government/publications/uk-anti-corruption-plan) in 2014 and in it committed to working with experts “to publish a corruption risk assessment template for Government departments and agencies aligned with the Cabinet Office fraud risk assessments” (see Action 17 in the Plan). A [Progress update on the UK Anti-Corruption Plan](https://www.gov.uk/government/publications/uk-anti-corruption-plan-progress-update) published on 12 May 2016 reported that this would be made available on the Gov.uk website by December 2016.

No sector is immune to bribery and corruption and central Government and those it does business with are vulnerable to the threat it poses. Employees and those associated with central Government have significant influence and access to sensitive information ranging from state secrets through to commercially confidential material and are at risk of being targeted by those seeking to corrupt. For departments, organisations and individuals to protect themselves from bribery and corruption a comprehensive understanding of the unique risks posed is essential to manage and mitigate the threat. So too is a commitment to transparency, open government and accountability.

This bribery and corruption self-assessment template takes the user through key questions all organisations will want to consider in order to: better understand and articulate the threat; establish the risks faced; and assess the organisations capacity to manage and mitigate that risk. We have set out a series of possible responses to each question accompanied by further guidance to help users identify areas needing improvement and how to make those improvements in order to develop a more robust approach to counter bribery and corruption activity. We also recommend summarising the current activity within the organisation for each question and setting out next steps. Those responsible for bribery and corruption within the organisation will be responsible for co-ordinating the completion of the form, but we recommend that it is signed off by top level management.

# Key Definitions

In this document a number of definitions are used. It is important to relate the following to your organisation:

|  |  |
| --- | --- |
| **Bribery** | Bribery is defined as – offering, promising, agreeing to receive or giving of a financial or other advantage to induce or reward improper functions or activities and/or the request or receipt of such an advantage. |
| **Corruption** | For the purposes of this document, corruption in the public sector including Central Government can be defined as the abuse of power by an official (or any employee entrusted to carry out the functions of government, including contractors) for personal gain. |
| **Fraud** | The term ‘Fraud’ is used to define offences contrary to the Fraud Act 2006 based on false representation, dishonesty, financial gain or loss and associated offences, which include bribery and money laundering. |
| **Risk Assessment** | A bribery and corruption risk assessment builds a comprehensive picture of the risks that an organisation faces, evaluates controls and evaluates the likelihood and impact of these risks. |
| **Threat Assessment** | A threat assessment considers the capability and intent of the potential harm |
| **Top Level Management** | Board of directors (or any other equivalent body or person) |

# Having completed the assessment sheet, please provide an overview of where your organisation is now in terms of the following areas:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Counter bribery and corruption culture** |  | Red |  | Amber |  | Green |

Top-level commitment (Q1)

Counter bribery and corruption strategy (Q2, Q3)

Counter Corruption Champions (Q4)

|  |  |
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| Overview |  |

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| --- | --- | --- | --- | --- | --- | --- |
| **Counter bribery and corruption high level risk assessment** |  | Red |  | Amber |  | Green |

Bribery and corruption risk and threat assessment (Q5, Q6)

Mitigation and ownership of risk (Q7, Q8, Q9)

Risks for business areas, partners and suppliers (Q10, Q11, Q12, Q13)

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| --- | --- |
| Overview |  |

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| --- | --- | --- | --- | --- | --- | --- |
| **Counter bribery and corruption procedures and tools** |  | Red |  | Amber |  | Green |

Tools to identify bribery and corruption activity (Q14)

Recording bribery and corruption incidents (Q15)

Processes to counter bribery and corruption (whistleblowing, audit etc) (Q16, Q17)

Investigation (Q18, Q19)

Insider threat, including gifts & hospitality registers, outsourced providers, data misuse (Q21, Q22, Q23)

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| Overview |  |

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| --- | --- | --- | --- | --- | --- | --- |
| **Counter bribery and corruption awareness, training and communication** |  | Red |  | Amber |  | Green |
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Training for all staff (Q24)

Civil Service Learning courses (Q25)

Outsourced providers (Q26)

Promoting guidance and reporting suspicions (Q27, Q28)

|  |  |
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| Overview |  |

# Counter bribery and corruption culture

1. Is there top-level management commitment to countering bribery and corruption in your organisation?

**Guidance notes**: The UK has demonstrated global leadership to tackle corruption by hosting the UK Anti-Corruption Summit in May 2016. The UK government committed to a package of actions (see all country commitments [here](https://www.gov.uk/government/publications/anti-corruption-summit-country-statements)) to tackle corruption in all its forms, including corporate secrecy and government transparency. It is therefore crucial that the UK demonstrates it is getting its own house in order and that there is top level commitment to tackling bribery and corruption in all central Government departments.

Top-level Management should be committed to preventing bribery and corruption by persons associated with the organisation and they should foster a culture within the organisation in which bribery and corrupt activity is never acceptable.

The Cabinet Office has developed Counter Bribery and Corruption Standards (which can be found on the [Government Counter Fraud pages](https://gcfprofessionalstandards.cabinetoffice.gov.uk/)). These set out the standards that organisations should follow to develop an effective response to bribery and corruption. They also identify the skills required by individual specialists working in counter bribery and corruption for HMG, with a maturity matrix attached to monitor and assess their capability and development.

| **Element** | **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- | --- |
| Commitment[[1]](#footnote-1) |  |  |  |  |
| Involvement[[2]](#footnote-2) |  |  |  |  |
| Communication[[3]](#footnote-3) |  |  |  |  |
| Statement[[4]](#footnote-4) |  |  |  |  |
| Zero Tolerance[[5]](#footnote-5) |  |  |  |  |

**In the space below, please provide a brief overview of current activity and future plans:**

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1. Does your organisation have a current counter bribery and corruption strategy (or a Fraud Strategy with specific corruption content)?

**Guidance notes**: A counter bribery and corruption strategy provides a platform for organisations to demonstrate their commitment to tackling bribery and corruption both externally and internally. It offers the opportunity for greater transparency both to staff and to the public more widely, and should take into account the Counter Bribery and Corruption Standards produced by the Cabinet Office (see [Government Counter Fraud pages](https://gcfprofessionalstandards.cabinetoffice.gov.uk/)).

Elements to consider for a counter bribery and corruption strategy:

* Define the scope, and which parts of the organisation are / are not covered by the strategy
* Define the current challenges the business and the counter bribery and corruption function is facing
* Define future challenges
* Demonstrate how the organisation’s fraud risk assessment feeds into the strategy
* Demonstrate key strengths and weaknesses of the organisation’s current counter bribery and corruption provision and approach
* Clearly define future aspirational state of the counter bribery and corruption approach
* Define the time period that the strategy will cover
* Define key activities that will be undertaken to move to a future aspirational state
* Define key stakeholders (may be annexed)
* Simply and compellingly (in language appropriate to the business) categorise the actions into areas that aid the communication of the strategy
* Define how progress against the strategy will be monitored, what the key metrics for success look like and how the organisation will know it is being successful
* State where the delivery plan for the strategy is held (likely to be an annexed action plan).

| **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- |
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**In the space below, please provide a brief overview of current activity and future plans:**

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1. How is the Counter Bribery and Corruption Strategy (or relevant part of the Fraud Strategy) implemented and communicated?

**Guidance notes**: it is crucial that the strategy is implemented across the organisation and that all staff are aware of it and what it means for them. See also section on Counter Bribery and Corruption Awareness, Training and Communication (Q24 onwards).

| **Element** | **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- | --- |
| Written strategy |  |  |  |  |
| Communicated internally, inductions/staff handbook/intranet |  |  |  |  |
| Communicated externally, internet/ commercial activity |  |  |  |  |
| Governance structures in place to support the strategy which are regularly reviewed/monitored |  |  |  |  |
| Reviewed for progress by top level management |  |  |  |  |
| Embedded in policies and procedures |  |  |  |  |
| Included in specific individuals work objectives |  |  |  |  |

**In the space below, please provide a brief overview of current activity and future plans:**

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1. Do you have a suitably trained, senior counter corruption champion in the organisation who promotes counter bribery and corruption messages?

**Guidance notes**: Organisations may benefit from having a senior counter corruption champion (or to have countering corruption as a specific responsibility within another role, such as counter fraud champion), responsible for promoting counter bribery and corruption messages. Audit, counter fraud, procurement, HR and other teams will want to ensure they work closely with the champion and each other.

The Government Anti-Corruption Champion is currently Sir Eric Pickles and his role is defined in the UK Anti-Corruption Plan (see page 56 paragraph 8.2).

| **Element** | **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- | --- |
| Champion in place |  |  |  |  |
| Champion communicates regularly on corruption issues |  |  |  |  |

**In the space below, please provide a brief overview of current activity and future plans:**

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# Counter bribery and corruption high level risk assessment

1. Do you undertake threat assessment activities to identify and assess capability and intent?

**Guidance notes**: The findings of the threat assessment should inform the assessment of risk, with a focus on ‘the capabilities and intent of a person or group with the potential to cause harm to the organisation’s objectives’. This can include an analysis of: past bribery, corruption or fraud; the skills needed for a perpetrator to be successful in the act of bribery / corruption and the opportunities to commit bribery / corruption in the organisation.

Some threats, for example the use of emerging technologies by third parties to commit new and unforeseen types of bribery or corruption, may be beyond the organisation’s control. In these circumstances, organisations should use threat-related knowledge/strategic intelligence to aid risk prioritisation. A threat assessment should be used to inform the bribery and corruption risk assessment (see Q6 below).

| **Element** | **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- | --- |
| Undertaken internal threat risk assessment including individual contracts/projects |  |  |  |  |
| Undertaken external threat risk assessment |  |  |  |  |
| Have you developed an action plan as a result of the outcome of your threat assessment? |  |  |  |  |
| Do you have a process of review? |  |  |  |  |

**In the space below, please provide a brief overview of current activity and future plans:**

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1. Do you include the assessment of bribery and corruption risk as part of your regular risk assessment process?

**Guidance notes**: The risk from bribery and corruption should be captured as part of detailed risk assessment undertaken on individual business areas as set out in the Government Counter Fraud Standards.

The Communications Electronics Security Group (CEGS) which is the national technical authority for information assurance, has published some helpful guidance on [managing information and risk](https://www.cesg.gov.uk/risk-management-collection). The principles set out in the [Ministry of Justice Bribery Act 2010 Guidance](https://www.gov.uk/government/publications/bribery-act-2010-guidance) will also be of assistance. Though the corporate failure to prevent offence under section 7 of the Bribery Act covers only ‘commercial organisations’, the Ministry of Justice Guidance is still valuable for Departments to consider. Furthermore, though Government Departments are not ‘commercial organisations’ for the purposes of section 7 and have crown immunity from prosecution, elements of their activities may be deemed as commercial when they trade as a commercial entity. Individuals within Government Departments are also criminally liable under the Bribery Act at all levels.

| **Element** | **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- | --- |
| Risk Assessments undertaken by a suitably experienced/qualified person(s) |  |  |  |  |
| Bribery and corruption risks clearly recorded in risk assessment |  |  |  |  |
| Taken account of country risk |  |  |  |  |
| Taken account of sector risk |  |  |  |  |
| Taken account of scope of organisation and its supply chain |  |  |  |  |

**In the space below, please provide a brief overview of current activity and future plans:**

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1. Are risk assessments documented and accessible to appropriate persons?

**Guidance notes**: The outcomes of the risk assessment should be effectively communicated with stakeholders in the organisation. This should include the development of a risk register for the organisation, via workshops and by briefing executive boards. See [Government Counter Fraud pages](https://gcfprofessionalstandards.cabinetoffice.gov.uk/) for further information on risk assessment.

| **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- |
|  |  |  |  |

**In the space below, please provide a brief overview of current activity and future plans:**

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1. How far is the organisation able to develop a clearer picture of which risks of bribery and corruption are greatest within the organisation and those associated with it?

**Guidance notes**: Risks from bribery and corruption can vary between organisations and it is important that suitably experienced staff carry out the assessment. Each organisation needs to understand the current risks it faces from bribery and corruption and where these risks lie. To do this, as a first step consider your assets; your vulnerabilities; who might benefit from your assets (and why); and how they could obtain them. The [UK Anti-Corruption Plan](https://www.gov.uk/government/publications/uk-anti-corruption-plan) and the recent [Progress Update on the UK Anti-Corruption Plan](https://www.gov.uk/government/publications/uk-anti-corruption-plan-progress-update) are helpful resources, as is the Cabinet Office Fraud Risk Assessment Standard which is available on the [Government Counter Fraud pages](https://gcfprofessionalstandards.cabinetoffice.gov.uk/).

| **Element** | **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- | --- |
| Top level oversight of process |  |  |  |  |
| Risk assessment process for bribery and corruption is embedded throughout the organisation |  |  |  |  |
| Identification and recording of risks |  |  |  |  |
| Evaluation of risks |  |  |  |  |
| Prioritisation of risks |  |  |  |  |
| Documented |  |  |  |  |

**In the space below, please provide a brief overview of current activity and future plans:**

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1. Do you have a regular risk assessment cycle that includes the effective mitigation of identified risks and the assignment of ownership?

**Guidance notes***:* Ensure that there is an area of business responsible for recording the risks for the whole organisation and that the risks are assessed and scored consistently across the organisation.

Risks should also be shared appropriately with relevant teams in the organisation to ensure the risk is managed and mitigated across the board.

| **Element** | **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- | --- |
| Clear owners of each risk identified |  |  |  |  |
| Mitigation steps and controls implemented |  |  |  |  |

**In the space below, please provide a brief overview of current activity and future plans:**

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1. Does the organisation consider / capture bribery and corruption risks presented by those it does business with (e.g. suppliers)?

**Guidance notes**: It is important to assess bribery and corruption risks arising from supply chain and customer sources and the potential for reputational or financial damage that these risks pose. Though Government departments are not criminally liable under Section 7 of the Bribery Act 2010, trading arms of departments and individuals within departments, may be considered criminally liable.

| **Element** | **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- | --- |
| Organisation includes customers/ suppliers in scope of own risk assessment(s) |  |  |  |  |
| Is assured that customers/those in the supplier chain have their own robust processes |  |  |  |  |

**In the space below, please provide a brief overview of current activity and future plans:**

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1. Has your organisation made its key external partners aware of the bribery and corruption risks it faces and expectations of those partners?

**Guidance notes**: Sharing your organisation’s understanding of its risks from bribery and corruption will increase accountability from partners (such as private sector and non-governmental organisations), ensure transparency and raise awareness of the risks of bribery and corruption to both the organisation and partner organisations.

| **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- |
|  |  |  |  |

**In the space below, please provide a brief overview of current activity and future plans:**

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1. Have you considered specific areas of your business where there is a common threat from bribery and corruption, including against relevant payment streams?

**Guidance notes**: In their [National Strategic Assessment of Serious and Organised Crime 2016](http://www.nationalcrimeagency.gov.uk/publications/731-national-strategic-assessment-of-serious-and-organised-crime-2016/file) the NCA highlights the risk of bribery and corruption in the public sector. Criminal groups use bribery and corruption to access sensitive information and corrupt elected officials and procurement systems for financial gain. They also target local government to manipulate processes such as housing or planning, and have been known to target officials in order to consolidate their status in communities.

* *Procurement*: This is a complex and significant area of risk for departments and the Government. The Chartered Institute for Procurement and Supply (CIPS) has published [guidance on procurement and supply](http://www.cips.org/corporate-ethics-code). The Competition and Markets Authority (CMA) has also produced some helpful tools and guidance on [spotting and avoiding bid-rigging](https://www.gov.uk/government/publications/letter-from-the-cma-to-procurement-professionals-on-bid-rigging) in the public procurement process.
* *IT and data*: [The Data Protection Act](https://www.gov.uk/data-protection/the-data-protection-act) may be helpful when assessing when and how data can be shared, particularly with external organisations.
* *Finance*: HM Treasury have related guidance available that may be helpful. [Fraud and the internal Auditor](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/207217/Fraud_and_the_Government_Internal_Auditor.pdf) and [Managing the Risk Fraud Guide for Managers](http://webarchive.nationalarchives.gov.uk/20130129110402/http:/www.hm-treasury.gov.uk/d/managing_the_risk_fraud_guide_for_managers.pdf.pdf).
* *People*: The Centre for the Protection of National Infrastructure (CPNI) has carried out extensive research into corrupt insiders and has produced [personnel security guidance](http://www.cpni.gov.uk/advice/Personnel-security1/) and tools to help organisations reduce their vulnerability to the insider threat and to mitigate the risks from well-placed insiders. Personnel security is a way in which to manage the risk of staff exploiting their legitimate access to an organisation’s assets or premises for unauthorised purposes. Rotating staff in key positions can for instance be effective in reducing the likelihood of bribes being offered and accepted. Weaknesses in effective protective security and management processes allow insiders to circumvent controls and exploit those weaknesses.

| **Element** | **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- | --- |
| Grants, loans |  |  |  |  |
| Commercial, procurement and contract |  |  |  |  |
| Information technology and data |  |  |  |  |
| Benefits |  |  |  |  |
| Administrative spend (e.g. payroll) |  |  |  |  |
| Capital spend (e.g. buildings, infrastructure) |  |  |  |  |
| Receipts (tax revenue) |  |  |  |  |

**In the space below, please provide a brief overview of current activity and future plans:**

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1. Have you considered specific areas of your business where there is a common threat from bribery and corruption, including from the following people / business areas?

**Guidance note**: Other common areas to consider are those in a position of trust, for instance those collecting taxes, fines and debt or issuing penalties or sanctions could be open to bribery.

| **Element** | **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- | --- |
| Finance |  |  |  |  |
| People (insider threat), particularly those key decision makers with powers |  |  |  |  |
| Those with responsibility for technical specifications |  |  |  |  |
| Those with responsibility for monitoring commercial activities |  |  |  |  |
| Those responsible for distributing grants |  |  |  |  |
| Those responsible for making policy decisions |  |  |  |  |
| Those responsible for making frontline decisions on funding |  |  |  |  |

**In the space below, please provide a brief overview of current activity and future plans:**

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# Counter bribery and corruption procedures and tools

1. Do you have data analytics and data washing processes in place to better identify possible bribery and corruption activity and/or data misuse for bribery and corruption purposes?

**Guidance notes**: Data washing and data analytics can be used to identify bribery and corruption. One of the options available is the National Fraud Initiative (NFI). The NFI is an exercise that matches electronic data within and between public and private sector bodies to prevent and detect fraud. Information about working with the NFI including timescales, case studies and general guidance can be found on the [Gov.uk pages on the NFI](https://www.gov.uk/government/collections/national-fraud-initiative).

It is important that [Data Protection Act](https://www.gov.uk/data-protection/the-data-protection-act) issues are considered when planning data washing activity.

| **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- |
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**In the space below, please provide a brief overview of current activity and future plans:**

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1. Do you have a system for recording and capturing all incidents of bribery and corruption and failures of the counter bribery and corruption management system?

**Guidance notes**: Organisations should ensure that they have procedures in place to capture all instances of suspected bribery and corruption and that they are reported appropriately (or investigated internally where an in-house investigation team exists) and followed up. Lessons should be learned wherever possible. This may be part of the organisation’s fraud and whistleblowing intelligence system, but if so there needs to be a mechanism to specifically identify bribery and corruption within this.

All staff should know how to report an incident and be confident that it will be followed up. Having a robust whistleblowing policy in place provides an avenue for staff to do this and helps to ensure that individuals can report malpractice without fear of losing their job or other reprisal. (See Q16 below).

| **Element** | **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- | --- |
| System for recording incidents of bribery and corruption |  |  |  |  |
| System for recording breaches of the counter bribery and corruption control system |  |  |  |  |
| Process for reporting incidents and breaches to top level management |  |  |  |  |

**In the space below, please provide a brief overview of current activity and future plans:**

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1. Do you have whistleblowing arrangements in place that are readily accessible and regularly reviewed?

**Guidance notes**: Having a good whistleblowing policy in place provides an important avenue of information to help uncover bribery and corruption and reduce malpractice in organisations, ensuring individuals can report malpractice without fear of reprisal.

The Department for Business Energy and Industrial Strategy (BEIS) has the following guidance for employers and employees:

* [Whistleblowing: Guidance for Employers and Code of Practice](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/415175/bis-15-200-whistleblowing-guidance-for-employers-and-code-of-practice.pdf)
* [Blowing the Whistle to a Prescribed Person](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/431221/bis-15-289-blowing-the-whistle-to-a-prescribed-person-list-of-prescribed-persons-and-bodies-2.pdf)

Helpful information is also available from the [Public Concern At Work](http://www.pcaw.co.uk/) website. CPNI also have a new education programme “It’s OK to Say”. For further information please email: [enquiries@cpni.gsi.uk](mailto:enquiries@cpni.gsi.uk).

Reviewing the outcomes following each disclosure will help organisations to strengthen their processes for listening and responding to employee concerns and taking remedial action if necessary.

| **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- |
|  |  |  |  |

**In the space below, please provide a brief overview of current activity and future plans:**

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1. Do you use business processes such as audit to identify vulnerability to bribery and corruption?

**Guidance notes**: Other business processes might include, for instance, safeguards in IT systems, such as counter penetration measures.

The National Audit Office provide a series of [frameworks and guides](https://www.nao.org.uk/highlights/self-assessment-resources/) to aid organisations self‑assessment and decision making.

| **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- |
|  |  |  |  |

**In the space below, please provide a brief overview of current activity and future plans:**

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1. Do you have an agreed process for investigating allegations of bribery and corruption? Do you have a dedicated resource for either investigating internally or for arrangements with external investigators?

**Guidance notes**: Many organisations have a dedicated investigation team. Where there is no resource it is good practice to have a named individual or team who is responsible for liaising with external investigators. See Government Counter Fraud Investigation Standards, Counter Bribery and Corruption Standards and Sanctions Redress and Punishment Standards on the [Government Counter Fraud pages](https://gcfprofessionalstandards.cabinetoffice.gov.uk/) for details.

Support and guidance on this may be sought from the Centre of Expertise in the Cabinet Office – [fed@cabinetoffice.gov.uk](mailto:fed@cabinetoffice.gov.uk).

CPNI also have guidance available on their website on [Investigating Employees of Concern](https://www.cpni.gov.uk/investigation-and-disciplinary).

| **Element** | **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- | --- |
| Case acceptance criteria for bribery and corruption |  |  |  |  |
| Trained internal capability to respond to incidents of bribery and corruption |  |  |  |  |
| Case management system to log allegations |  |  |  |  |
| An arrangement with external investigators |  |  |  |  |
| Plan to continually develop skills and capability of investigators |  |  |  |  |
| Sanctions and Redress policy for investigators to refer to |  |  |  |  |

**In the space below, please provide a brief overview of current activity and future plans:**

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1. Do you have an agreed process for reporting allegations of bribery and corruption?

**Guidance notes**: An internal process should consider how information is securely handled and that adequate procedures are in place in accordance with the Bribery Act 2010.

External agency may include another cross government or public sector organisation including, but not limited to, the Serious Fraud Office or law enforcement i.e. City of London Police.

Guidance on reporting can be found in the Counter Bribery and Corruption Standards (see [Government Counter Fraud pages](https://gcfprofessionalstandards.cabinetoffice.gov.uk/)).

| **Element** | **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- | --- |
| Process to report allegations of bribery and corruption internally |  |  |  |  |
| Process to report allegations of bribery and corruption to external agency |  |  |  |  |

**In the space below, please provide a brief overview of current activity and future plans:**

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1. Do you have control mechanisms in place to help minimise the possibility of insider threat for staff?

**Guidance notes**: Appropriate control mechanisms are dependent on the organisation’s assessed risks. For individuals within an organisation opportunity, vulnerability and motivation are key factors to consider in terms of assessing their bribery and corruption risk. The CPNI guidance referred to earlier is a helpful resource for identifying and minimising the insider threat as is the [CPNI risk assessment advice](https://www.cpni.gov.uk/insider-risk-assessment). For instance through observing changes in behaviour: reluctance to take leave, changes in life-style. You should also consider exit arrangements, agency staff arrangements, how clear and well communicated your code of conduct is, gifts and hospitality recording (see Q21 below) and so on in terms of insider threat.

* *Recruitment*: Consider vetting checks on key staff and the frequency that reviews should be carried out. Cabinet Office have produced some helpful [guidance](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/299547/HMG_Personnel_Security_Controls.pdf). CPNI also have helpful guidance on conducting [pre-employment screening](https://www.cpni.gov.uk/pre-employment-screening).
* *External interests and notifiable associations*: Ensure procedures are in place for gathering this information and consider checking staff in key threat areas. You may also want to consider comparing supplier data against staff data.

Managers should be aware of ways to identify employees who may be susceptible to bribery and corruption. Consider whether there are any skill gaps.

| **Element** | **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- | --- |
| For recruitment |  |  |  |  |
| External interest/conflict of interest |  |  |  |  |
| Notifiable associations |  |  |  |  |

**In the space below, please provide a brief overview of current activity and future plans:**

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1. Does your organisation have a gifts and hospitality register covering both offer and receipt, including things offered but not accepted?

**Guidance notes**: Your gifts and hospitality register should include gifts offered, received and declined. It should also record what was done with the gift if accepted and kept by the Department.

Elements of an effective gifts and hospitality register should include:

* Mandatory policy and procedures for all staff
* Line manager approval process for the authorisation of gifts or hospitality
* Clear definition of both gifts and hospitality to include offer of use of transport, accommodation and costs to attend conferences
* Clear guidance that the acceptance of gifts or hospitality should be generally refused and only accepted in prescribed circumstances
* Setting of a maximum financial limit for the receipt of gifts
* Guidance given when hospitality may be accepted
* Guidance on how to accept gifts where refusal would cause offence (gift not to be retained by the staff member)
* Auditable process for the recording of both offers and acceptance of the gift or hospitality
* Process for staff to sign to say they have understood the policy on a yearly basis
* A record maintained of who offered the gift or hospitality

| **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- |
|  |  |  |  |

**In the space below, please provide a brief overview of current activity and future plans:**

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1. Does your organisation review the counter bribery and corruption procedures of outsourced service providers?

**Guidance notes**: A proportionate review (depending on the nature and scale of the service) of service providers your organisation uses may add an extra layer of protection from the risk of bribery and corruption – for instance IT suppliers.

| **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- |
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**In the space below, please provide a brief overview of current activity and future plans:**

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1. Do you safeguard high risk data sets from potential misuse by corrupt individuals?

**Guidance notes**: Loss of data that the organisation holds presents a significant threat to the organisation and to Government as a whole, especially if it falls into the wrong hands.

What measures are in place to protect your organisation from the risk of bribery and corruption for internal and external data sharing? For example, consider what information (and how and when that information) is shared. Is it shared on a need to know basis and is personal information protected? Is there a shared understanding of what can and can’t be shared and in what circumstances?

| **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- |
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**In the space below, please provide a brief overview of current activity and future plans:**

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# Counter bribery and corruption awareness, training and communication

1. Do training programmes address the responsibilities of all staff for the detection and prevention of bribery and corruption for issues such as integrity of staff, security and vetting, and HR processes, etc?

**Guidance notes**: The risk of bribery and corruption should feature in training programmes for all levels of staff – the risks need to be recognised throughout the organisation including induction and management and should be captured in the staff handbook. All staff need to be made aware of their own responsibilities, as do contractors who should be informed of the organisation’s policy for countering bribery and corruption. In particular, key decision-makers should be familiar with the [Statutory Guidance of the Bribery Act 2010](https://www.gov.uk/government/publications/bribery-act-2010-guidance).

It is helpful for bribery and corruption risks to be considered when new policies and procedures are developed. The risks identified should be cascaded as part of staff training.

| **Element** | **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- | --- |
| Integrity of staff |  |  |  |  |
| Security and vetting |  |  |  |  |
| HR |  |  |  |  |
| Counter bribery and corruption is covered in induction training |  |  |  |  |
| Counter bribery and corruption is covered in the staff handbook |  |  |  |  |
| Counter bribery and corruption resources are readily available to staff on the intranet |  |  |  |  |
| Key decision-makers within an organisation are familiar with the Statutory Guidance of the Bribery Act 2010 |  |  |  |  |

**In the space below, please provide a brief overview of current activity and future plans:**

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1. Does your organisation promote the counter fraud, bribery and corruption learning available to all Government departments on the Civil Service Learning portal?

**Guidance notes**: E-learning is available on the [Civil Service learning portal](https://civilservicelearning.civilservice.gov.uk/) entitled ‘Counter fraud, bribery and corruption: all staff’ and ‘Counter fraud, bribery and corruption: managers’. It will raise staff awareness, knowledge and understanding of the importance of tackling fraud, and of the risks and issues in relation to bribery and corruption. It highlights the role and responsibilities everyone has in fighting fraud and promoting an effective counter fraud culture across government.

| **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- |
|  |  |  |  |

**In the space below, please provide a brief overview of current activity and future plans:**

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1. Do you promote awareness of bribery and corruption with your outsourced partners / supply chain?

| **Element** | **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- | --- |
| Counter bribery and corruption requirements are built into contracts |  |  |  |  |
| How to report incidents of bribery and corruption is promoted with outsourced partners |  |  |  |  |

**In the space below, please provide a brief overview of current activity and future plans:**

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1. Does your organisation publish and promote guidance on countering bribery and corruption and the relevant elements of the Civil Service Code?

**Guidance notes**: The [Civil Service Code](file:///\\hoconf.net\dfs\UserData\Users05\rapleyc\Data\Documents\Colligo\Files\Corruption\Civil%20Service%20Code%20https:\www.gov.uk\government\publications\civil-service-code\the-civil-service-code) is part of a contractual relationship, setting standards of expected behaviour of all civil servants and a commitment to the Civil Service core values of: integrity, honesty, objectivity and impartiality.

| **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- |
|  |  |  |  |

**In the space below, please provide a brief overview of current activity and future plans:**

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1. Do you communicate/raise awareness of bribery and corruption within your organisation and the channels available to report suspicions?

**Guidance notes**: Consider how your organisation raises awareness of bribery and corruption and how messages can be reinforced to enable staff to be better aware of the risks of bribery and corruption within their work area/role.

| **Yes** | **Developing** | **No** | **Don’t know** |
| --- | --- | --- | --- |
|  |  |  |  |

**In the space below, please provide a brief overview of current activity and future plans:**

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1. There should be a clear and effectively communicated commitment throughout the organisation. It should be evidenced through statements, resourcing and embedment [↑](#footnote-ref-1)
2. Active involvement of the Board or equivalent with a named point of contact, ensuring that regular discussion takes place at board level [↑](#footnote-ref-2)
3. Should include internal and external communications including regular updates on counter bribery and corruption issues accessible to all those associated with the organisation [↑](#footnote-ref-3)
4. A statement should be published on a yearly basis which is refreshed and takes account of the changing nature of bribery and corruption [↑](#footnote-ref-4)
5. Action should be taken against all breaches in bribery and corruption controls and proactive action should be taken to reduce opportunities for bribery and corruption. [↑](#footnote-ref-5)