



Government
Counter Fraud
Profession

Operated by the Public Sector Fraud Authority

Government Counter Fraud Profession

A Standard for the
Counter Bribery and
Corruption Professional

Alternative format versions of the report are available on request from the Public Sector Fraud Authority: PSFA@cabinetoffice.gov.uk

Public Sector Fraud Authority

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“The counter fraud Professional Standards and Guidance are designed to present a consistent cross government approach to countering fraud, bribery and corruption; raise the capability of individuals and, through this, increase the quality of organisations’ counter fraud and corruption work.”

**Mark Cheeseman OBE,
Chief Executive, Public Sector Fraud Authority**



Introduction

A Standard for the Counter Bribery and Corruption Professional.

Purpose

This document contains the agreed Professional Standards and Guidance for countering bribery and corruption in central government. This document is part of the wider government counter fraud standards and guidance, which cover all the core disciplines and sub disciplines in the Government Counter Fraud Framework.

The counter fraud Professional Standards and Guidance are designed to present a consistent cross government approach to countering fraud; raise the capability of individuals and, through this, increase the quality of organisations' counter fraud work.

Their aim is:

- To describe the knowledge skills and experience (Professional Standards and Competencies) needed for an individual to achieve Practitioner level in counter fraud work in their desired discipline. The document directs you to competency frameworks which outline how someone can progress to this standard.
- To provide guidance to those using the standards on the processes and products they will use to deliver the discipline and what they should seek to put in place in the organisation to deliver the discipline effectively.

The 'Organisational Guidance' can also be used to consider what should be in place in an organisation to be using this sub discipline effectively.

The extent to which central government bodies use this standard will vary and depend on their assessment of the risk of bribery and corruption in their organisation and their investment in counter bribery and corruption activities.¹

Organisations that assess a low degree of risk or have an agreed high-risk tolerance may not have access to counter bribery and corruption capability within their business. When they identify bribery or corruption and are accessing counter bribery and corruption resource, they will increasingly be expected to ensure that those resources meet the standards laid out in this document. Over time, this will help ensure that counter bribery and corruption is completed to an appropriate standard and in an efficient manner.

These standards will form the basis of the bribery and corruption sub discipline that is being established within government. To be acknowledged as a counter fraud professional these standards will have to be met. Guidance is being developed and will be made available on Civil Service Learning Counter Fraud pages regarding how you can be recognised as a member of the Government Counter Fraud Profession (GCFP).

¹ This document focuses on the individual and organisational standards, aligned to the MOJ's Guidance, required to counter bribery and corruption. Both build on the Counter Fraud Standards and are not to be read in isolation. The ISO and BS10500 are commercially available standards against which an organisation can be externally certified (for a fee). The principles described in these commercially available documents, together with other sources including Transparency International, have all been taken into consideration in the design of the Counter Bribery and Corruption standard which is for government to utilise.

Contents

This document contains the following:

Professional Standards and Guidance: for the individual level of knowledge skills and experience required to prevent, detect and respond to bribery and corruption.

The Competency Framework: outlining the individual knowledge skills and experience required by those operating effectively and how these develop through different competency levels - Foundation, Practitioner and Advanced Practitioner.

Guidance for Professionals includes:

- **Product guidance** describing what good quality Counter Bribery and Corruption (CBC) products look like.
- **Process guidance** describing the recommended processes for organisations to correctly implement an effective CBC approach.
- **Organisation guidance** how to develop and implement CBC activity in an Organisation to deal with those who commit fraud.

The standards have been created, reviewed and agreed by the Professionals' Board, the body responsible for the counter fraud Professional Standards and Guidance. The board has been assisted by an expert cross-sector advisory group and the Fraud Advisory Panel.

Public Sector Fraud Authority (PSFA)

In the Spring Statement 2022, the Chancellor announced the creation of a new Public Sector Fraud Authority, which launched in August 2022. The PSFA provides increased scrutiny of activity to reduce fraud and economic crime, and builds broader and deeper expert services to support departments and public bodies to further improve their capability. The PSFA builds on the foundations of the Functional centre for Counter Fraud,

formerly known as the Centre of Expertise. The PSFA has an established [mandate](#) that sets out the roles and responsibilities for it and for ministerial departments and public bodies interacting with it.

The purpose of the PSFA is to work with public bodies to understand and reduce the impact of fraud. It will bring:

- A greater focus on performance and outcomes.
- Increased depth and breadth of support.
- Integrated partnership between Cabinet Office (CO) and HM Treasury.

The PSFA will transform the way that government manages fraud, it's mission is to:

- Modernise the fraud and error response by widening access, and use of, leading practices, tools and technology - better protecting taxpayers money.
- Build expert led services that collaborate with experts in Departments and Public Bodies to better fight fraud and error through risk, prevention, data and enforcement techniques.
- Develop capability in the public sector to find, prevent and respond to fraud and error - both organisationally and individually.
- Put performance at the heart of the public sector fraud conversation - focusing on investments and outcomes.
- We will aim to be seen as a beacon of fraud and error expertise and a destination for those wanting to make a difference in fighting public sector fraud.

The PSFA is structured with 3 service and 4 function areas, one of which is Practice Standards and Capability. It is from here a central team supports the oversight and development of the Government Counter Fraud Profession, working with 17 public bodies, via an Oversight Board, to agree the strategy, focus and products of the Profession.

The PSFA is also the home of the Centre of Learning for Counter Fraud which is responsible for building a vibrant learning community, improving the counter fraud capability and providing fraud leaders with industry leading skills.

Government Counter Fraud Framework

This document covers the Bribery and Corruption Discipline of the Government Counter Fraud Framework.

The framework covers all of the core disciplines and sub disciplines that a public sector organisation will need to call upon to deal with the fraud threat that the public sector faces. Organisations will call on these to different extents depending on the nature of their business and services and the associated fraud threat, as assessed through their fraud risk assessment.

- **Organisational Level:** This is aimed at the organisation. It is covered by the [Counter Fraud Functional Standards](#). These state the basics that organisations should have in place to have an effective counter fraud response. It includes things like having a risk assessment, a fraud policy and having fraud awareness across the organisation.
- **Core Disciplines:** The core disciplines include a functional leadership level (Leadership, Management and Strategy) for those that are responsible for coordinating an organisation's overall response to fraud and economic crime. The main area is in the functional delivery level. This details the core disciplines that an organisation may use in an effective counter fraud response. Within these core disciplines, are details of the knowledge, skills and experience needed to undertake these disciplines effectively.

- **Sub Disciplines:** The sub disciplines are areas of additional knowledge, skills and experience that enhance capability across a number of core disciplines. For instance, knowledge, skills and experience in Counter Bribery and Corruption will help counter fraud professionals undertake more effective risk assessments and investigations (depending on their role).

Bribery Focused Standard

This standard is focused on the knowledge skills and experience to counter the offence of bribery as defined by the United Kingdom Bribery Act 2010.

Corruption is often seen as precursor to bribery and has been defined by HM Government (HMG) as:

“Corruption is the abuse of entrusted power for private benefit that usually breaches laws, regulations, standards of integrity and/or standards of professional behaviour²”.

2 Lord Sharpe of Epsom, The Parliamentary Under-Secretary of State, Home Office. Corruption in the United Kingdom - Hansard - UK Parliament 13 October 2022.

Figure 1 – The Government Counter Fraud Framework

Organisational Level



Functional Standards

The Functional Standards detail the basics that an organisation should have in place to have an effective counter fraud response. This includes a level of fraud awareness across the organisation.

Core Disciplines



Leadership, Management and Strategy

An awareness across all specialist areas and the capability to define an effective counter fraud response and how to deploy the specialisms in the business.

Risk Assessment

Measurement

Prevention and Deterrence

Use of Data and Analytics

Culture

Detection

Intelligence and Analysis

Investigation

Sanctions, Redress and Punishment

Sub Disciplines



Bribery and Corruption

Money Laundering

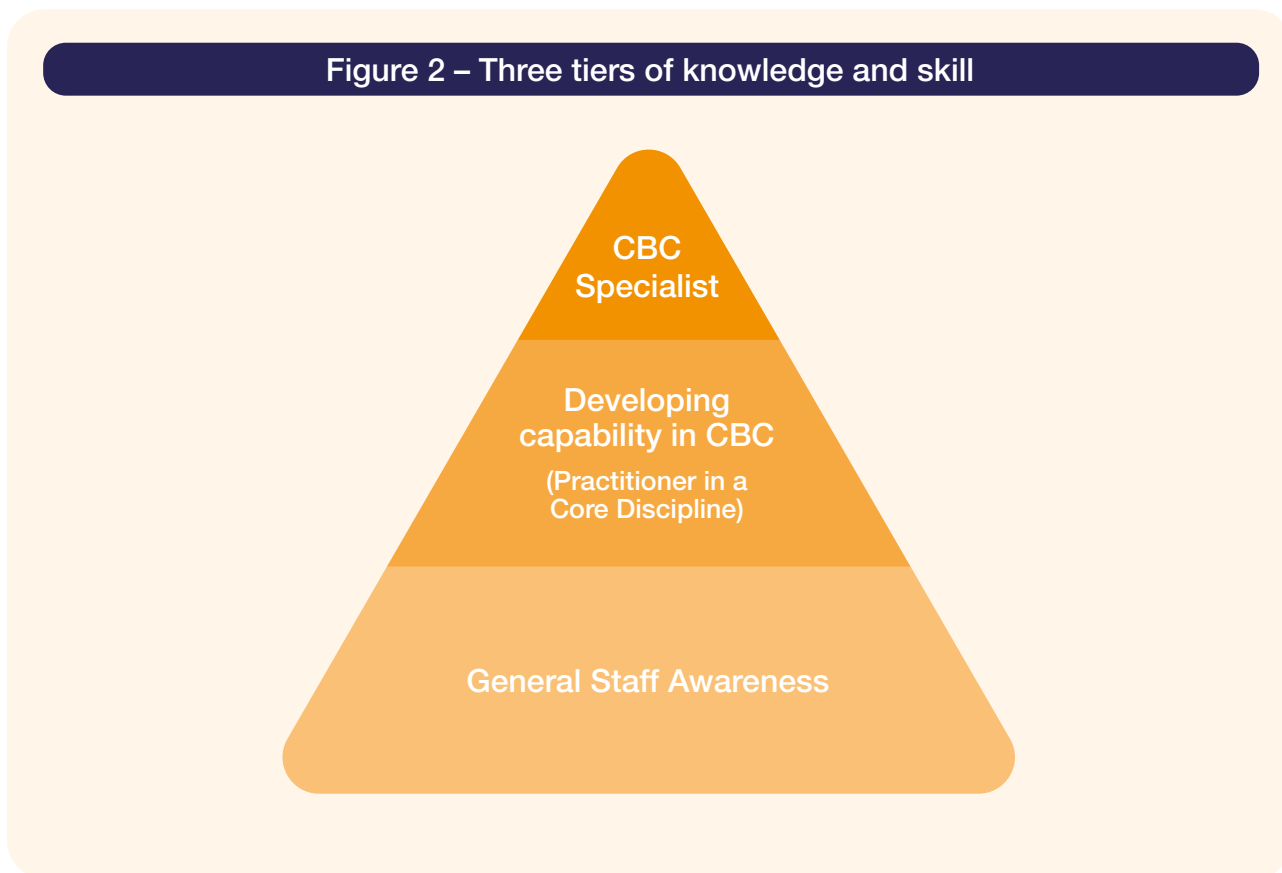
Disruption

Cyber Fraud

Criminal Justice

Interaction with the Counter Fraud Framework

To effectively counter bribery and corruption across Government three different tiers of knowledge and skill are required by those associated with the organisation depending on their role.



The first tier of general staff awareness of bribery and corruption, this is for all employees within an organisation and will be fully detailed in the General Fraud Awareness professional standard and guidance. The second tier of developing capability of bribery and corruption is referenced throughout the other Professional Standards and Guidance within the government counter fraud framework, where applicable. The third tier of the Bribery and Corruption sub discipline details the knowledge required at Foundation, Practitioner and Advanced Practitioner for the specialist level, as defined within this document.

The Counter Fraud Disciplines below will contain detailed CBC elements and as such are not duplicated within this document.

- General fraud awareness.
- Management and strategy.
- Detection.
- Measurement.
- Use of data and analytics.
- Culture.

The remaining Professional Standards and Guidance in the framework require additional top-up elements over and above the trainee competency level, these are detailed in the competency framework.

Professional Standards and Competencies

Counter Bribery and Corruption

Introduction

The Professional Standards and competencies are designed to present a consistent cross-government approach to counter fraud and raise the quality of organisations' counter fraud and the skills of their individuals.

They set out high-level principles to be reflected in counter fraud work. They are designed to help organisations identify the research, training and resources needed to develop their capability further. Individuals should use the standards to measure and develop their skills.

When using these standards organisations must ensure that they have the necessary legal authorities in their enabling legislation before implementing any particular standard.

The Professional Standards and competencies are not intended to cover every eventuality or every specific issue that may arise and should be adapted to the organisation's resources and fraud risk profile.

This document focuses on individuals' counter bribery and corruption capability.

For this document the definition of bribery is taken from the Bribery Act 2010 (UKBA),³ in broad terms this is the:

“Offering, promising or giving a financial or other advantage to induce or reward improper performance and/or the request or receipt of such an advantage. It includes the corporate offence of failing to prevent bribery.”

The UKBA creates an offence under Section 7, which can be committed by commercial organisations⁴ that fail to prevent persons associated with them from committing bribery on their behalf. It is a defence to such an offence if the organisation had 'adequate procedures' in place to prevent persons associated with it from bribing. Detailed guidance on such procedures has been issued by the Ministry of Justice⁵ and should be read in conjunction with these standards.

Whether a public sector organisation is liable under the UKBA as a 'commercial organisation' is dependent on the nature of its activities and its statutory form.⁶ These Professional Standards and Guidance recognise it is good practice for all public sector organisations to have adequate procedures in place where there are not specific exemptions under the Act.⁷

3 See the Bribery Act 2010 at <http://www.legislation.gov.uk/ukpga/2010/23/contents>.

4 A body or partnership incorporated or formed in the UK which carries on business in the UK irrespective of place of incorporation or formation.

5 See <https://www.justice.gov.uk/downloads/legislation/bribery-act-2010-guidance.pdf>

6 Regarding the term 'carries on business', Guidance on the Bribery Act states that 'it does not matter if (an organisation) pursues primarily charitable or educational aims or purely public functions. It will be caught if it engages in commercial activities, irrespective of the purpose for which profits are made.'

7 There are specific exemptions under Section 13 of the Act covering certain military and intelligence functions.

How corruption, as opposed to bribery, is pursued is likely to depend on interpretation but for the purposes of CBC this standard focuses on the extensive guidance available concerning the UKBA as the actions required are similar.

General Guidance

These Professional Standards and capabilities detail the skills to be demonstrated in bribery and corruption activities. They are designed to help organisations and individuals identify the level of competency required to effectively counter bribery and corruption. Organisations should use the standards and Competency Framework to measure and develop the skills of those engaged in CBC work.

This sub discipline is focused on the prevention, detection and response to instances of bribery and corruption. It includes many factors, such as understanding:

- The nature of bribery and corruption.
- The relevant law.
- Not all corrupt activities are crimes or economic in nature.
- The controls to prevent bribery and corruption.
- The options available to respond to allegations of bribery and corruption.

General Principles

Whether operating in a criminal, civil, disciplinary or regulatory field, the CBC sub discipline standards and guidance is expected to apply them in a fair, ethical and professional manner. The application of the CBC standards and guidance should be subject to regular review/scrutiny pursuant to the relevant process concerned whether criminal, civil, regulatory or disciplinary.

Those engaged in applying the CBC standards and guidance should:

- Recommend where appropriate improvements to controls should be made; ensure that these are reported to those charged with governance, such as audit committees.
- Have due regard to the financial and legal implications of decisions made during the activity.
- Demonstrate practical application of the relevant legislation, associated codes of practice and relevant departmental policy.
- Ensure activity is consistent with the Civil Service values and behaviours, diversity and equality policy and in accordance with individual organisations' code of conduct and investigatory practices and procedures.
- Review and update legislation, policies and procedures regularly as necessary.

Competency Framework (Bribery and Corruption)

The information below explains the structure of the competency framework and how it can be utilised by members of the Profession.

Key Components Explained

Components outline at a high level, the knowledge, skills and experience required for each core and sub discipline. There are nine components for CBC that break down into **elements** describing the knowledge, skills and experience required for effective CBC activity. These elements are then grouped into a Competency Framework document.

Competency Levels

Within the Competency Framework for CBC are three **Competency Levels**. These range from **Foundation**, and **Practitioner** to **Advanced Practitioner**. These can be used to identify progression within the CBC standard. The Framework helps you to establish for each element where your competency level is and where you have areas you may wish to develop.

General rules about the **Competency Levels** are set out below.

- **Foundation** is about having the knowledge.
- **Practitioner** is about demonstrating the application of the knowledge.
- **Advanced Practitioner** is about having a more expansive, specialist knowledge and being able to use this to evaluate and improve what is being done.

Understanding Categories

Categories are defined combinations of elements, which show the knowledge, skills and experience expected for each core discipline. Categories are not people or grade specific and the title or description used by organisations may be different to those below. A category is retained for your core discipline when accessing the CBC sub discipline. Please see the core discipline standards and guidance for further information.



The entry point for individuals for the CBC Sub Discipline is at the Practitioner level within a core discipline. The trainee level for CBC is embedded throughout the other core disciplines, which is why the Competency levels begin at Foundation in CBC. The competency framework and standards define the knowledge skills and experience outlined in the CBC key components that are required in this sub discipline. Depending on the Category of the person engaged in CBC activities a different blend of the key components would be required as illustrated per table 1 below.⁸

Key Components					
Matrix Element	Investigation	Intelligence	Risk Assessment	Prevention	Sanctions and Redress
Legislation and Organisational Policy and Procedure	✓	✓	✓	✓	✓
Typologies	✓	✓	✓	✓	✓
Risk Assessment			✓	✓	
Prevention			✓	✓	
Intelligence		✓			
Investigation	✓				
Sanctions, Redress and Punishment	✓				✓
Stakeholder Engagement	✓		✓	✓	✓

We have also introduced Categories for **Managers** within core disciplines, for example for Investigation there are two categories:

- **Investigation Manager (IM)** – Strategic oversight of operations, resource and Investigation activity.
- **Senior Investigation Officer (SIO)** – As above for IM, but with the addition of being actively involved in Investigations, leading major/complex Investigation and/or still having own casework alongside managerial duties.

There is a pre requisite knowledge required to access the Manager Categories for CBC. This is as follows illustrated using Investigation:

- **Investigation Manager (IM)** – must demonstrate Foundation level in CBC and the relevant category of Investigation they manage staff in and then the Manager elements for Investigation.
- **Senior Investigation Officer (SIO)** – must demonstrate Practitioner level in CBC, the category of Investigation standards they manage staff in and then the Manager elements of Investigation.

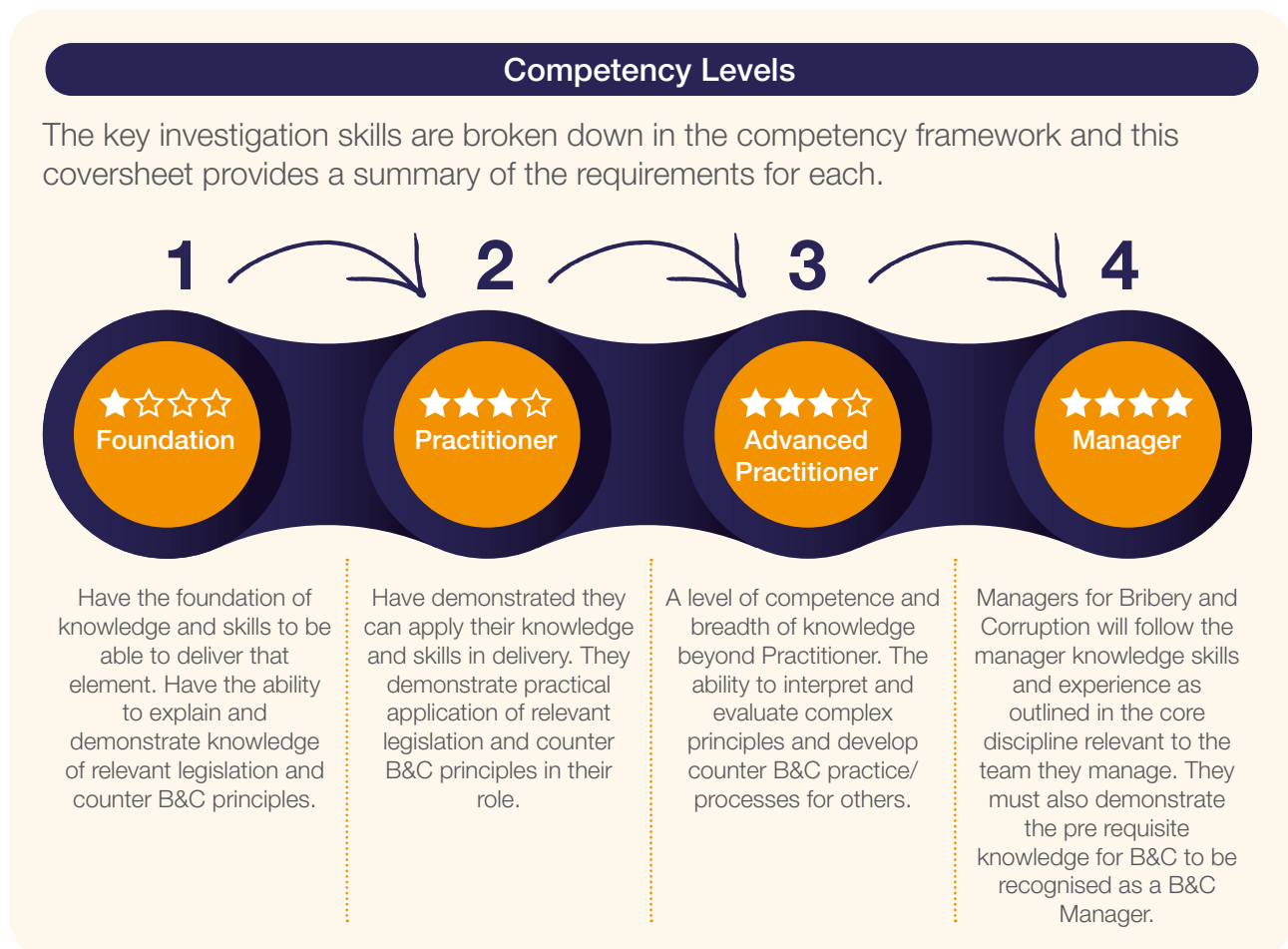
8 Depending on the requirements of the organisation it may be desirable for the role holder to demonstrate competency in all areas of the CBC key components.

This approach is similar for the other core disciplines, that to manage staff you must demonstrate not only the relevant competency of the core discipline, but also the CBC standards and then the manager elements (which are unique to each core discipline).

How we will recognise the Advanced Practitioner level will be determined at a later stage, but for now members may use those elements in the framework for self-assessment of their knowledge, skills and experience to help map their development.

Advanced Practitioner

Advanced Practitioner works differently to the other competency levels, as there are no predetermined categories. Instead, members can select individual or groups of elements they have a particular interest or focus in, to demonstrate their knowledge, skills and experience.



1. Legislation and Organisational Policy

Legislation and Organisational Policy			
Competency	Foundation (F)	Practitioner (P)	Advanced Practitioner (AP)
1.1 Organisational Policy and Procedures	Explain the organisational policy and procedures regarding counter bribery and corruption.	Demonstrate the design of organisational policy regarding counter bribery and corruption.	Evaluate the policy requirements to effectively counter bribery and corruption. Is a recognised subject matter expert in organisational counter bribery and corruption policy.
1.2 Pre-Bribery Act Legislation	Explain the legislation relevant to bribery and corruption including pre-Bribery Act legislation including the Prevention of Corruption Acts 1906 and 1916, Public Bodies Corrupt Practices Act 1889 and Misconduct in a Public Office.	Apply knowledge of the legislation in place, prior to the enactment of the UK Bribery Act 2010 including pre-Bribery Act legislation including the Prevention of Corruption Acts 1906 and 1916, Public Bodies Corrupt Practices Act 1889 and Misconduct in a Public Office.	Interpret the legislation relevant to Bribery and Corruption including pre-Bribery Act legislation including the Prevention of Corruption Acts 1906 and 1916, Public Bodies Corrupt Practices Act 1889 and Misconduct in a Public Office and can analyse the meanings of the legislation into everyday language.
1.3 UK Bribery Act 2010	Explain the United Kingdom Bribery Act 2010 (UKBA) and its application.	Apply their knowledge and understanding of the UKBA to demonstrate application of the points to prove, covering the range and reach of the UKBA.	Interpret the application of the UKBA and how it applies to specific situations. Can design guidance / reference material for the benefit of others in the organisation. Can evaluate the understanding and application of others.
1.4 Adequate Procedures	Explain the six guiding principles of the Adequate Procedures detailed in the MOJ Guidance.	Demonstrate applying the six guiding principles of the Adequate Procedures detailed in the MOJ Guidance and relate them to the organisational context and demonstrate how to effectively embed them throughout the organisation.	Evaluate the application of the six guiding principles of the Adequate Procedures from the MOJ guidance across the organisation. Analyse how effective the controls of an organisation are.
1.5 Case Law	Explain the implications of stated cases / case law relating to Misconduct in a public office, Prevention of Corruption Acts 1906 and 1916 and the Bribery Act 2010.	Demonstrate the application of case law, relating to Misconduct in a Public Office, Prevention of Corruption Acts 1906 and 1916 and the Bribery Act 2010, in investigation. Demonstrate an assessment of the implications to the organisation and investigations undertaken.	Evaluate the application of case law, relating to Misconduct in a Public Office, Prevention of Corruption Acts 1906 and 1916 and the Bribery Act 2010, in investigation. Support others in applying the relevant case law related to bribery and corruption legislation applicable to the region.

Legislation and Organisational Policy

Competency	Foundation (F)	Practitioner (P)	Advanced Practitioner (AP)
1.6 International Framework: Organisation for Economic Cooperation and Development (OECD)	Explain the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and its implications for the organisation.	Demonstrate the application of the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions	Evaluate, and advise others on, the application of the OECD conventions and how it relates to the organisation and investigations and assess its relevance to the organisation and investigations.
1.7 Public Interest Disclosure Act (PIDA) 1998	Explain the provisions of the PIDA and its implications for bribery and corruption investigations.	Apply the principles of the PIDA in relation to bribery and corruption investigations.	Interpret the PIDA and support others to ensure processes are correctly applied. Is a recognised subject matter expert in organisational PIDA policy.
1.8 Mutual Legal Assistance	Explain the process and legal framework for requesting material from international jurisdictions and the role of the UK Central Authority.	Demonstrate applying the process and legal framework for requesting material from international jurisdictions and the role of the UK Central Authority.	Evaluate the application of the process and legal framework for requesting material from international jurisdictions and the role of the UK Central Authority. Can advise on organisational policies and procedures that should be followed when gathering material from international jurisdictions.
1.9 Fraud Act 2006 Section 4	Explain the relevant provisions of the Fraud Act 2006 in particular section 4 Fraud by Abuse of Position and its correlation to the Bribery Act.	Demonstrates application of the Fraud Act 2006 section 4 Fraud by Abuse of Position and its correlation to the Bribery Act.	Evaluate and advise on applying the Fraud Act 2006 section 4 Fraud by Abuse of Position and its correlation to the Bribery Act.
1.10 International Bribery legislation	Explain the bribery and corruption legislation of the international jurisdiction(s) where the organisation is active and the impact this may have on both the organisation and investigations.	Demonstrate applying the bribery and corruption legislation of the international jurisdiction(s) where the organisation is active and the impact this may have on both the organisation and investigations.	Evaluate the impact of overseas bribery and corruption legislation on both the organisation and investigations. Can support others to apply the points to be taken into consideration.

Legislation and Organisational Policy			
Competency	Foundation (F)	Practitioner (P)	Advanced Practitioner (AP)
1.11 Organisational Controls	Explain the range of organisational controls and policy available to prevent bribery and corruption including gifts and hospitality, rotation of duties, HR recruitment vetting and conflict of interest issues, financial delegations, good governance, separation of responsibilities.	Demonstrate the application of knowledge of the organisational policy regarding the range of organisational controls available to prevent bribery and corruption including gifts and hospitality, rotation of duties, HR recruitment vetting and conflict of interest issues, financial delegations, good governance, separation of responsibilities.	Evaluate the application of knowledge of the organisational policy regarding the range of organisational controls available to prevent bribery and corruption including gifts and hospitality, rotation of duties, HR recruitment vetting and conflict of interest issues, financial delegations, good governance, separation of responsibilities. Can support others to apply the organisational policy regarding the range of organisational controls available to prevent bribery and corruption.

2. Typologies

Typologies			
Competency	Foundation (F)	Practitioner (P)	Advanced Practitioner (AP)
2.1 Wider Context	Explain the wider context of bribery and corruption and its harm to individuals, organisations and society	Apply the wider context of bribery and corruption to the organisational situation and relate it to investigations undertaken.	Analyse and interpret the wider context of bribery and corruption and implement the learning within the organisation. Can support the organisation on the potential of risk and harm of the wider context relating to the organisational activities.
2.2 Cultural Considerations	Explain the global differences in defining bribery and corruption and how the passing of gifts/hospitality is viewed differently around the world.	Demonstrate application of knowledge of the global differences in defining bribery and corruption and how the passing of gifts is viewed differently around the world.	Evaluate the cultural considerations and their potential impact on the organisations activities. Has expert knowledge on the cultural differences across the world. Can support others to apply their knowledge of the global differences in defining bribery and corruption.
2.3 Role of Intermediaries	Explain the role of intermediaries in bribery and corruption and how controls can be applied to minimise the bribery risk.	Demonstrate the interpretation of the role of intermediaries and the bribery and corruption risk they represent. Demonstrate the design of organisational controls when the organisation uses intermediaries.	Analyse the role of intermediaries and the bribery and corruption risk they represent. Can assist and give expert advice in the design of organisational controls when the organisation uses intermediaries.
2.4 Methods and motives	Explain the methods and the motivation involved in bribery and corruption cases that impact on HMG.	Demonstrate applying knowledge of the role of those involved in bribery and the methods used in HMG bribery and corruption cases.	Analyse both the current and historic methods and the motivation involved in bribery and corruption cases which impact on HMG. Interpret the threat to the organisation and provide advice, both to the organisation and others, in the current trends and risks.
2.5 Grooming	Explain the process of 'grooming' to develop a corrupt relationship and how this may be evidenced in an investigation.	Demonstrate applying knowledge of the process of 'grooming' to develop a corrupt relationship and can develop the controls to minimise this happening.	Analyse both the current and historic methods used in the process of 'grooming' to develop a corrupt relationship and can develop the controls to minimise this happening. Interpret the threat to the organisation and provide advice, both to the organisation and others, in the current trends and risks.
2.6 Critical Touch Points	Explain the term 'critical touch point' and how grooming can occur in bribery cases.	Demonstrates applying knowledge of the critical touch points and assessment of where they occur in the organisation. Demonstrate advising on the controls to be implemented to minimise the bribery risks.	Evaluate and design controls to reduce the risk of bribery and corruption through limiting the opportunity for critical touch points across the organisation. Analyse the effectiveness of controls to counter critical touch points.

Typologies

Competency	Foundation (F)	Practitioner (P)	Advanced Practitioner (AP)
2.7 Range of Offending	Explain the spectrum of offending, encompassing petty and grand corruption.	Demonstrate applying knowledge of the potential for the range of offending across the organisation and how different styles of bribery may impact on the business.	Can evaluate the organisations vulnerability to the differing types and styles of bribery and corruption. Can design out vulnerabilities across the organisation.
2.8 Bribery Elements	Explain the three elements of bribery, namely inducement, influence and impact.	Apply the three elements of bribery, namely inducement, influence and impact, to the organisation and advise on the indicators of each element. Applies these indicators to investigations to generate lines of enquiry.	Evaluate the organisation's ability to limit those involved in bribery and corruption to function across the organisational activities. Evaluate and design policies and processes to identify when a bribery symptom is present, for example, design and implement an early warning system.
2.9 Enablers	Explain the range of enablers frequently used to facilitate bribery and corruption.	Apply knowledge of the range of enablers used to facilitate bribery and corruption.	Evaluate the organisation's ability to identify bribery and corruption enablers. Can design systems and draft policies and procedures to deny those perpetrating bribery and corruption access to the enablers required. Can support the organisation and others to understand how enablers are used to facilitate bribery and corruption.
2.10 Related Offences	Explain the link between bribery and corruption and other offences including fraud.	Apply the link between bribery and corruption and other offences. Demonstrate consideration of the range of offences likely to be related to bribery and corruption.	Evaluate investigations which identify the link between bribery and other offences. Support others to apply the link between bribery and corruption and other offences.
2.11 Understanding the Term Advantage	Explain what constitutes an advantage in bribery cases.	Demonstrate the identification and recording the range of advantages seen in bribery cases. Demonstrate where the evidence of the advantage may be in investigations.	Can offer support across the organisation in understanding advantage and evaluate where the opportunities may occur and advise how to reduce the risk.
2.12 Understanding the Term Improper Performance	Explain what constitutes improper performance of a relevant function or activity.	Applies the identification of improper performance seen in bribery investigations.	Evaluate the identification of improper performance seen in bribery investigations. Support others to reduce the risk of improper performance.
2.13 Pathology of Bribery	Explain the mechanics of bribery including how the offer and / or request for a bribe is typically made.	Can apply their knowledge to recognise how bribery is instigated.	Evaluate how the organisation and / or individuals recognise how bribery is instigated.

Typologies

Competency	Foundation (F)	Practitioner (P)	Advanced Practitioner (AP)
2.14 Motivation	Explain the motivation for those involved in bribery and corruption including need and greed.	Apply how the motivation for those involved in bribery and corruption impacts upon investigations.	Interpret the theories relating to the motivation for those involved in bribery and corruption and how these impact upon investigations. Support the organisation to reduce the factors which motivate this form of offending. Evaluate the organisation's response to limiting the factors and make recommendations, where necessary.
2.15 Politically Exposed Persons (PEPs)	Explain the role of PEPs in bribery investigations.	Apply their knowledge of the role politically exposed persons play in bribery investigations.	Evaluate the application of knowledge of the role PEPs play in bribery investigations. Interpret potential impact on the organisation and investigations. Support the organisation to reduce the risk regarding PEPs.
2.16 Corrupt Networks	Explain how bribery offences can often be part of a larger corrupt scheme involving a number of actors either directly or indirectly involved in the investigation. Explain the importance of information security when responding to bribery and corruption.	Apply their knowledge of how bribery offences can often be part of a larger corrupt scheme involving a number of actors either directly or indirectly involved in the investigation. Demonstrate application of the importance of information security. Demonstrate safeguarding information and the restriction of information circulated on a need to know basis.	Evaluate the risks to the organisation of corrupt networks. Design organisational policies and interpret the current threats. Support others undertaking investigations of the workings of corrupt networks.

3. Risk Assessment

Risk Assessment			
Competency	Foundation (F)	Practitioner (P)	Advanced Practitioner (AP)
3.1 Understanding Bribery Risks	Explain the nature of bribery and corruption specific risks and harm and their identification across the organisation. Explain how bribery and corruption risks extend through an organisation's supply / service delivery chain and the responsibility of the organisation for this.	Demonstrate the consideration of bribery and corruption specific risks and harm throughout an organisation's supply chain. Applies their knowledge of bribery risks, both general and specific to the organisation.	Interpret the range of knowledge of bribery and corruption risks across multiple sectors and administrations. Evaluate and articulate the risks to organisation.
3.2 Government High Level Bribery and Corruption Risk Assessment	Explain the Government Standard High-Level Bribery and Corruption Risk Assessment and its interaction with wider Fraud and Corruption Risk Assessment and organisational risk management.	Demonstrate the application of the Government Standard High-Level Bribery and Corruption Risk across an organisation, understanding the assurance it gives, and the limitations of this assurance.	Evaluate the application of the Government Standard High-Level Bribery and Corruption Risk across an organisation, understanding the assurance it gives, and the limitations of this assurance.
3.3 Undertaking a Risk Assessment	Explain how bribery and corruption risk assessments, at a variety of levels of detail, can be undertaken across an organisation, both on existing and future activities.	Produce bribery and corruption risk assessments, at a variety of levels of detail, undertaken across an organisation, both on existing and future activities. Can advise and prepare policies and procedures concerning risk assessments that link to the UKBA and MOJ guidance document.	Analyse the effectiveness of the practice of Corruption Risk Assessment and interpret how a range of sectors and administrations conceive and apply it in developing the UK approach. Evaluate the effectiveness of other bribery and corruption assessments.
3.4 Controlling Risk	Explain the benefits and limitations of controls in mitigating bribery and corruption risks.	Demonstrate how to evaluate the limitations and benefits of a variety of bribery and corruption controls.	Analyse the evaluation of the limitations and benefits of a variety of bribery and corruption controls.
3.5 Integrating Risk Assessments	Explain the options, advantages and disadvantages for separate or integrated bribery and corruption and fraud risk assessments.	Demonstrate effective decision making on an appropriate route for an organisation for undertaking bribery and corruption and fraud risk assessments.	Analyse the decision making on the appropriate route for an organisation for undertaking bribery and corruption and fraud risk assessments. Evaluate the options, advantages and disadvantages for separate or integrated bribery and corruption and fraud risk assessments.

Risk Assessment

Competency	Foundation (F)	Practitioner (P)	Advanced Practitioner (AP)
3.6 Embedding Assessments	Explain how to embed bribery and corruption risk assessments, or fraud risk assessments with bribery and corruption aspects, across an organisation.	Demonstrate delivery of embedded corruption risk assessments or fraud risk assessments with bribery and corruption aspects, across an organisation.	Evaluate the effectiveness of embedded bribery and corruption risk assessment assessments or fraud risk assessments with bribery and corruption aspects, across a range of organisations and sectors.
3.7 Mitigating Risk Controls	Explain what controls can be put in place to reduce bribery and corruption risks and the limitations of the controls.	Apply their knowledge, skills and understanding to identify and implement proportionate controls across an organisation and those associated with it, identifying the limitations of the controls.	Analyse the effectiveness of the controls across an organisation and those associated with it to reduce bribery and corruption risks and the limitations of the controls. Support others to implement controls that link to the UKBA and MOJ guidance document.
3.8 Risk Management Evaluation	Explain how to evaluate, on an on-going basis, the effectiveness of bribery and corruption controls and how these may degrade over time. Explain how this relates to an organisation's Internal and External Audit programme.	Apply their knowledge, skills and understanding to deploy tools or processes which monitor the on-going effectiveness of bribery and corruption controls.	Evaluate the deployment of tools or processes which monitor the on-going effectiveness of bribery and corruption controls.

4. Prevention

Prevention			
Competency	Foundation (F)	Practitioner (P)	Advanced Practitioner (AP)
4.1 Anti-Bribery Prevention System	Explain the component parts of an effective anti-bribery and corruption prevention system including training and education which is focussed on those most at risk. Explain the link to the UKBA and the MOJ Guidance document.	Apply their knowledge, skills and understanding to deploy the anti-bribery and corruption prevention system for the organisation. Demonstrates the testing of the effectiveness of the prevention system.	Evaluate the anti-bribery and corruption prevention system for the organisation and analyse its effectiveness.
4.2 Ethics and Zero Tolerance	Explain the importance of good business ethics including setting the tone at the top and having a zero tolerance to bribery and corruption.	Apply their knowledge, skills and understanding to develop good business ethics throughout the organisation and can embed a zero tolerance acceptance of bribery and corruption throughout the organisation.	Evaluate and design effective business ethics procedures throughout the organisation, which relate to countering bribery and corruption. Interpret organisational policy to advise on breaches of an ethical approach to business / conduct.
4.3 Bribery and Corruption Health Check	Explain how to conduct a bribery and corruption health check to identify control weaknesses.	Demonstrate the ability to develop, undertake and maintain an effective health check process throughout the organisation. Apply their knowledge, skills and understanding to identify and advise on weaknesses and how to rectify problems identified.	Evaluate the delivery and design of a bribery and corruption health check process and analyse its effectiveness.
4.4 Training and Education	Explain how to prepare counter bribery and corruption training and education material.	Demonstrate the effective delivery of counter bribery and corruption training packages and presentations for those associated with the organisation.	Evaluate the effectiveness of the delivery of counter bribery and corruption training packages and presentations for those associated with the organisation.
4.5 Due Diligence	Explain the importance of due diligence and how to embed it throughout the organisation. Explain the principles of due diligence.	Demonstrate the delivery of activities to embed due diligence throughout the organisation. Produce advice for stakeholders in how to implement policy and procedures and how to respond to breaches of the due diligence policy.	Evaluate and design effective due diligence policies and procedures. Analyse the effectiveness of the due diligence procedures.

Prevention

Competency	Foundation (F)	Practitioner (P)	Advanced Practitioner (AP)
4.6 Reporting Concerns	Explain how to encourage the reporting of concerns and how to develop a process to handle reported concerns.	Demonstrate how to develop and implement reporting procedures across the organisation, which applies best practice and adherence to the legal framework.	Evaluate the effectiveness of the reporting procedures for an organisation. Analyse their effectiveness and interpret the trends from reports made and take the appropriate action. Support others in responding to reports of bribery and corruption, advising on the action to be taken.
4.7 Anti-Bribery and Corruption Toolkit	Explain how to develop a comprehensive anti-bribery and corruption toolkit.	Demonstrate the development of an anti-bribery and corruption toolkit, which incorporates all the required component parts.	Evaluate and design the anti-bribery and corruption toolkit for an organisation, which incorporates all the required component parts. Analyse the toolkits effectiveness and accessibility, embedding it across the organisation.
4.8 Engagement	Explain the importance of engaging across the organisation to embed prevention in all functions and activities. Display the knowledge to actively promote prevention activities effectively.	Apply their knowledge, skills and understanding to engage with a wide range of stakeholders to embed prevention activities across the organisation. Demonstrate promotion of the activity through effective communication, including the delivery of workshops and events.	Evaluate the impact of stakeholder engagement to embed prevention activities across the organisation. Analyse promotion of the activity through effective communication, including the delivery of workshops and events.
4.9 Resource Management	Explain how to engage at all levels to ensure the threat, risk and potential harm is understood to ensure the appropriate resources are deployed in response to the threat within the context of the organisation.	Apply their knowledge, skills and understanding to report the threat, risk and potential harm and loss across the organisation. Assess the level of resources deployed in response to the threat within the context of the organisation and recommend the resources required to counter the risks identified.	Analyse the organisation's counter bribery and corruption resourcing and evaluate its effectiveness. Support the organisation to deploy further resources, where appropriate.
4.10 Reviewing Controls	Explain how to prepare policies and procedures, embedded across the organisation, which monitor the effectiveness of the controls in place to deter bribery and corruption.	Produce policies and procedures, embedded across the organisation, which monitor the effectiveness of the controls in place to deter bribery and corruption. Apply policy and procedures to assess the effectiveness of controls in place.	Evaluate policies and procedures, embedded across the organisation, which monitor the effectiveness of the controls in place to deter bribery and corruption. Analyse the actions taken by the organisation to rectify breaches identified.

Prevention			
Competency	Foundation (F)	Practitioner (P)	Advanced Practitioner (AP)
4.11 Operational Learning	Explain the importance of sharing with all stakeholders' operational learning and lessons learnt. Explain operational debriefs and their importance to operational learning.	Demonstrate the delivery of operational debriefs, which include operational learning and lessons learnt, ensuring they are implemented.	Evaluate the effectiveness of the operational debriefs and learning procedures undertaken across the organisation. Demonstrate the ability to write policies and procedures to ensure operational learning is embedded across the organisation. Interpret lessons learnt and ensure they are implemented across the organisation.
4.12 Communication	Explain the importance of communicating across the organisation a deterrence message, which should include the sanctions undertaken against those associated with the organisation. Explain a range of methods by which regular communication should be undertaken, reinforcing the prevention message.	Demonstrate effective communication across the organisation, to promote the prevention and deterrence message, which should include sanctions and redress. Demonstrates a range of methods to deliver regular communications, continually seeking best practise.	Analyse the effectiveness of the communication methods across the organisation, to promote the prevention and deterrence message, which should include sanctions and redress. Support individuals and the organisation through recommending improvements to communication methods to deliver prevention and deterrence messages across the organisation.

5. Intelligence

Intelligence			
Competency	Foundation (F)	Practitioner (P)	Advanced Practitioner (AP)
5.1 Intelligence	Explain the range of sources which hold relevant information relating to bribery and corruption investigations and recognise the access routes available.	Demonstrate effective intelligence sharing in bribery and corruption investigations across the organisation through utilising a range of sources and access routes. Ensure policies and procedures are in place to fulfil legal and procedural responsibilities.	Evaluate and design policies and procedures to identify, assess and share intelligence in bribery and corruption investigations across organisations. Support individuals and the organisation to deliver effective intelligence sharing in bribery and corruption investigations.

6. Investigation

Investigation			
Competency	Foundation (F)	Practitioner (P)	Advanced Practitioner (AP)
6.1 Recognise Indicators (Red Flags)	Explain the range of red flags indicating bribery and corruption and how to respond appropriately. Explain how indicators may highlight lines of enquiry in an investigation.	Demonstrate the ability to identify red flags, which indicate bribery and corruption. Deploy measures which respond to red flags identified and demonstrate the following of lines of enquiry generated from the indicators of bribery and corruption.	Evaluate the organisation's processes to identify the indicators of bribery and corruption. Support and mentor others to respond to the red flag indicators. Is recognised as subject matter expert in this field.
6.2 Case Acceptance Criteria	Explain the elements of effective case acceptance criteria and how to apply the principles to referrals made.	Demonstrate the application of effective case acceptance criteria to referrals made.	Analyse the effectiveness of case acceptance criteria taking into account referrals to external organisations and internal organisational requirements. Support others to develop guidance, in own organisation and externally.
6.3 Evidence Preservation	Explain how to gather and preserve evidence in bribery and corruption enquiries. Explain the range of specialists available to assist in crime scene management.	Demonstrate the development of preservation and evidence gathering procedures and processes within the organisation. Apply the process of preservation / recovery of material in bribery and corruption crime scenes.	Evaluate the effectiveness of the preservation and evidence gathering procedures and processes within the organisation. Advise on matters relating to bribery and corruption crime scenes and the preservation / recovery of material.
6.4 Covert Investigation Opportunities	Explain the opportunities for proactive (covert) opportunities in bribery and corruption investigations. Explain how to deploy opportunities in a lawful manner considering the legal and procedural frameworks.	Demonstrate the recognition and use of covert enquiries in bribery and corruption investigations, when appropriate. Develop organisational procedures and policies.	Evaluate the effectiveness of the procedures and policies, relating to covert enquiries in bribery and corruption investigations. Analyse the deployment of covert enquiries in bribery and corruption investigations. Support others in the use of covert enquiries.
6.5 Initial Case Assessment	Explain how to undertake an initial assessment of the suspected bribery and corruption allegation, including the limitations of this activity.	Demonstrate undertaking an initial bribery and corruption case assessment. Develop organisational procedures and policies for initial case assessments.	Evaluate the effectiveness of initial assessments conducted across the organisation.

Investigation

Competency	Foundation (F)	Practitioner (P)	Advanced Practitioner (AP)
6.6 Reporting	Explain who should be consulted / informed of the report / suspicion of bribery and corruption. Describe the wide range of stakeholders who may be informed of the report / suspicion of bribery and corruption. Explain when a referral should be reported both internally and externally. Describe the relevant protocols for reporting bribery and corruption and the roles of different organisations.	Demonstrate the development of policies and procedures for the reporting of referrals both internally and externally, including the appropriate protocols and roles. Provide advice on specific incidents and the appropriate reporting route.	Evaluate policies and procedures for the reporting of referrals both internally and externally, including the appropriate protocols and roles. Analyse advice given on specific incidents and support others to develop policies and procedures for the reporting of referrals.
6.7 Response Landscape	Explain the bribery and corruption response landscape including the roles of HMG Agencies and law enforcement with a responsibility for combating bribery and corruption.	Demonstrate working collaboratively across the bribery and corruption response landscape, including the HMG Agencies and law enforcement organisations with a responsibility for combating bribery and corruption.	Evaluate the collaborative working across the bribery and corruption response landscape, including the HMG Agencies and law enforcement organisations with a responsibility for combating bribery and corruption. Contribute to the development of protocols and policies for roles and responsibilities across the response landscape.
6.8 Available Mutual Assistance	Explain the stakeholders available to assist in the response to bribery and corruption allegations (which is normally part of a fraud response plan).	Demonstrate collaborative working with all stakeholders to counter bribery and corruption. Contribute to the development of policy and organisational procedures.	Analyse the network of stakeholders available to assist in the response to bribery and corruption allegations. Interpret bribery and corruption policy and assess the effectiveness of organisational procedures.
6.9 Response Plan	Explain the process / rationale for implementing an organisational response plan to follow if bribery and corruption is suspected or there are breaches of the organisational controls	Demonstrate the development of an organisational response plan, ensuring all the requisite elements are covered. Demonstrate the plan is maintained and updated as necessary.	Evaluate, and advise, on developing organisational response plans, including the maintenance of them. Support others to develop response plans, in own organisation and externally.
6.10 Following the Benefit	Explain how to plan a financial investigation and follow the benefit in relevant cases. Explain the role, responsibilities and powers of a financial investigator.	Demonstrate the development of policy and procedures to trace the financial aspects of a bribery investigation. Demonstrate the engagement with financial investigations to follow the benefit in bribery and corruption investigations.	Evaluate, and advise, on drafting policy and procedures to trace the financial aspects of a bribery and corruption investigation. Analyse the engagement with financial investigations to follow the benefit in bribery and corruption investigations. Has a mature network in other organisations to support the tracing financial assets.
6.11 Investigative Mind-set	Explain how to apply the 'investigative mind-set' in the investigation of bribery and corruption.	Demonstrate the effective application of investigative mind-set in bribery and corruption investigations.	Evaluate the use of investigative mind-set bribery and corruption investigations. Support others to apply investigative mind-set in bribery and corruption investigations.

Investigation			
Competency	Foundation (F)	Practitioner (P)	Advanced Practitioner (AP)
6.12 Minimise Material Attrition	Explain the importance of minimising material attrition in bribery and corruption investigations and how to act to minimise material attrition	Demonstrate the application of minimising material attrition in bribery and corruption investigations and ensuring it is used to maximise material recovery.	Evaluate the application of minimising material attrition in bribery and corruption investigations and ensuring it is used to maximise material recovery. Prepare guidance material on the subject for others within the organisation and support them to implement.
6.13 Evidencing Improper Performance	Explain the nature and footprint of the improper performance element of bribery and how to recover this evidence.	Demonstrate effective investigation techniques to identify the improper performance.	Interpret the effectiveness of investigation techniques to identify the improper performance. Demonstrate the ability to act as a tactical advisor offering specialist advice within own organisation and beyond.
6.14 Establishing the Advantage	Explain the nature and footprint of the advantage element of bribery and how to recover this evidence.	Demonstrate effective investigation techniques to identify the advantage.	Interpret the effectiveness of investigation techniques to identify the advantage. Demonstrate the ability to act as a tactical advisor offering specialist advice within own organisation and beyond.
6.15 Failure to Prevent Bribery	Explain how the failure to prevent bribery (Section 7 Offence) is triggered in bribery investigations.	Demonstrate the development of organisational policy and procedures regarding the failure to prevent bribery (Section 7 Offence).	Evaluate the organisational policy and procedures regarding the failure to prevent bribery (Section 7 Offence). Demonstrate the ability to act as a tactical advisor offering specialist advice within own organisation and beyond.
6.16 Adequate Procedures	Explain the elements required to demonstrate adequate procedures in the defence of Section 7 and how these can be evidenced in an investigation.	Demonstrate the development of organisational policy and procedures regarding adequate procedures (Section 7).	Evaluate the organisational policy and procedures regarding adequate procedures (Section 7). Demonstrate the ability to act as a tactical advisor offering specialist advice within own organisation and beyond.
6.17 International Investigations	Explain the international framework of organisations engaged in countering bribery and corruption and how these may assist in international investigations.	Demonstrate the identification and liaison with international partners to combat bribery and corruption. Contribute to the development of protocols and policies regarding this activity.	Evaluate the identification and liaison with international partners to combat bribery and corruption. Interpret the protocols, policies and processes regarding this activity.
6.18 Assessing Benefit	Explain how to assess, both direct and indirect, financial benefits of bribery and corruption, including the use of third parties.	Demonstrate the assessment of, both direct and indirect, financial benefits of bribery and corruption, including the use of third parties. Contribute to the development effectiveness of the organisational processes to identify both direct and indirect financial benefits of bribery and corruption.	Evaluate the assessment of, both direct and indirect, financial benefits of bribery and corruption, including the use of third parties. Demonstrate the ability to be a tactical advisor offering specialist advice within own organisation and beyond.

Investigation

Competency	Foundation (F)	Practitioner (P)	Advanced Practitioner (AP)
6.19 Memorandum of Understanding (MoU)	Can explain the elements of the Bribery MoU and how to utilise it when engaging with a partner organisation.	Demonstrate the use of MoUs in engaging with partner organisations.	Analyse the use and effectiveness of MoUs in engaging partner organisations. Support others, both internally and externally, to develop MoUs and is recognised as a subject matter expert.
6.20 Mutual Assistance Treaties	Explain the purpose of mutual assistance treaties and how they can be accessed to gain assistance in bribery and corruption enquiries.	Demonstrate the development of organisational policy and procedures regarding mutual assistance treaties. Demonstrate the use of mutual assistance treaties in bribery and corruption investigations.	Evaluate the development of organisational policy and procedures regarding mutual assistance treaties. Analyse the use of mutual assistance treaties in bribery and corruption investigations. Demonstrate the ability to be a tactical advisor offering specialist advice within own organisation and beyond.

7. Sanctions and Redress

Sanctions and Redress			
Competency	Foundation (F)	Practitioner (P)	Advanced Practitioner (AP)
7.1 Parallel/Multi Track Enquiries	Explain how to conduct parallel / multi track enquiries in bribery and corruption investigations (criminal, disciplinary, regulatory and civil investigations) and the differences in the burden of proof.	Demonstrate the conduct of parallel / multi track enquiries. Can demonstrate the development of policies and procedures for the organisation.	Evaluate the effectiveness of parallel / multi track enquiries. Interpret the policies and procedures for the organisation. Can demonstrate the ability to be tactical advisor offering specialist advice.
7.2 Deferred Prosecution Agreements (DPA)	Explain Deferred Prosecution Agreements under the Crime and Courts Act 2013 and the Deferred Prosecution Agreements' Code of Practice and the implications for investigations.	Demonstrate the consideration of Deferred Prosecution Agreements under the Crime and Courts Act 2013 and the Deferred Prosecution Agreements' Code of Practice and the implications for investigations, when applicable to specific investigations. Apply the criteria to be met and the process required.	Evaluate the effectiveness of policies and procedures for the organisation and is a tactical advisor offering specialist advice on Deferred Prosecution Agreements under the Crime and Courts Act 2013 and the Deferred Prosecution Agreements' Code of Practice and the implications for investigations.
7.3 Civil Redress and Sanctions	Explain the opportunities for civil recovery in bribery and corruption investigations.	Demonstrate the use of civil recovery in bribery and corruption investigations	Evaluate the effectiveness the civil recovery taken in bribery and corruption investigations, including claims for damages. Can demonstrate the ability to be tactical advisor offering specialist advice.
7.4 Role of Regulators	Explain the role of the regulators in combating bribery and corruption. Explain how to make referrals to the regulator.	Demonstrate the engagement with regulators to ensure all organisational policies and procedures are applied updated, as necessary.	Evaluate and design organisational policies to work with relevant regulatory agencies and analyse the organisation's effectiveness in meeting its regulatory obligations,
7.5 Guidance for Prosecutors	Explain the guidance for prosecutors in bribery and corruption investigations.	Apply the guidance for prosecutors in bribery and corruption to ensure it is reflected in the investigative practices undertaken throughout the organisation.	Evaluate the understanding of the legal framework which can be considered and applied in bribery and corruption investigations.

8. Stakeholder Engagement (Landscape)

Stakeholder Engagement (Landscape)			
Competency	Foundation (F)	Practitioner (P)	Advanced Practitioner (AP)
8.1 Stakeholder Engagement	Explain the investigative landscape, roles, responsibilities and information held in response to bribery and corruption.	Demonstrate an extensive knowledge of all those involved in countering bribery and corruption. Demonstrate a positive contribution by engagement across the counter bribery and corruption community.	Evaluate the organisation's stakeholder engagement strategy, analysing the effectiveness of the strategy and provide advice to the organisation of any changes required.

Guidance on Processes

Introduction

This guidance covers effective CBC processes. Individuals must be able to plan, identify and embed these processes in organisations to effectively counter bribery and corruption.

All processes and procedures should be regularly revised and evaluated to ensure they are of the required standards and remain current.

Planning

When working in CBC individuals should consider the following factors.

- Ensure policies detail and apply the principles led by the Standards in Public Life.
- Ensure internal systems should identify the uploading/transfer or unauthorised access to large or valuable data sets for review for indications of bribery.
- Consider what intelligence is likely to be available publicly about relevant individuals and organisations, how this might be gathered and whether specific circumstances warrant this. This may include utilising those experienced in gathering internet intelligence.
- Ensure involvement in cross organisational/public sector groupings which address counter bribery measures across their organisations.
- Plan to monitor compliance with standards of conduct in relation to counter bribery across the organisation.
- Define how progress against the counter bribery strategy will be monitored, what the key data (metrics) looks like and how the organisation can assess if it is being successful.
- Ensure the measurement team (i.e. Fraud Loss Measurement) informs the organisations risk register.⁹
- Identify associated organisations who undertake activities on behalf of the organisation and retain contracts, data and records. Ensure any discrepancies are analysed either within the intelligence/analysis function or passed on within the organisation as appropriate for further action.
- Identify the opportunities and process for civil recovery in bribery and corruption cases.
- Ensure that staff¹⁰ are required to 'sign up' to knowledge and acceptance of counter bribery policies on an annual basis and a record maintained.
- Ensure that staff are required to declare any relevant interests, or confirm that they have no such interests, prior to involvement in procurement exercises.

⁹ Fraud Loss Measurement can also show new risks that should be fed through to the risk assessment.

¹⁰ Relevant staff informed by the Bribery and Corruption Risk Assessment.

Implement

- Conduct procurement and contracting in a fair and transparent manner with a requirement by third parties to evidence their own effective counter bribery culture prior to any contractual arrangement, whether by way of a specific instruction or entry onto a framework agreement. Such third parties should also be required to provide periodic confirmation of initial evidence as required during the period of the framework agreement and/or on instruction regarding a specific contract.
- Undertake effective risk based due diligence as part of recruitment practices and before entering contractual arrangements with third parties. Policies should reflect where ongoing monitoring is required such as with large corporate accounts, high profile contracts and overseas jurisdictions where bribery is recognised as a common practice.
- Undertake due diligence on existing associated parties over time, adopting a risk based approach such that those working in jurisdictions or with industries with higher risk profiles are reviewed first.
- Undertake effective contract monitoring which is good practice to identify errors as well as fraud. However, monitoring may also identify discrepancies in contract awards, additional payments for related services and performance issues which could be linked to bribery. The awareness that effective monitoring will be carried out can be an effective deterrent to each and such monitoring should be implemented across the organisation.
- Ensure senior management are informed if there are insufficient funds available to conduct prevention and deterrent measures identified as appropriate and the potential impact of this for the business.

Response

- Consider the level of specialist knowledge required to undertake bribery investigations and whether this can be provided by in-house, other government resources or external agencies. In the case of the latter two options, processes should be in place to agree the provision of appropriate resources.
- Ensure investigations should always be undertaken by those with the appropriate knowledge, skills and understanding, as detailed in the individual standards section of both this and the Investigations Standards. By their nature bribery investigations may lack documentary evidence and involve individuals and entities outside the public-sector organisation. Gathering information directly from such parties is likely to involve criminal powers which may be unavailable to the organisation or inappropriate for it to use given the potential breadth of such an investigation. As such any investigation is likely to focus on the roles of organisational staff.
- Ensure that all those concerned with bribery investigations are aware of information security and restrict access to information to those that need to know.

Review

- Regularly review data and agree appropriate data sharing arrangements within and outside the public sector to counter cross-organisational bribery.
- Review national, sectoral or typology initiatives to detect or prevent bribery and reflect findings in organisational approaches.
- Review Bribery Act decisions and ensure lessons learned are factored into organisational counter bribery measures.
- Ensure reported instances of bribery are compared with publicly available sector analysis and the organisations own substantive risk review to evaluate the scale of bribery issues and whether issues detected correspond to risk analysis within and outside the organisation.

Guidance on Products

Introduction

This guidance covers what good quality products should include to enable an effective CBC response for government. The design and content of these documents should be unique to the organisations activities, factors to be taken into consideration include:

- The nature of the organisations activities, internal and external context.
- The size and complexity of the organisation.
- Geographical location of these activities.
- The breadth and depth of its supply chain.
- Who it does business with.

A suitably trained and skilled person should undertake the design and maintenance of these documents.

CBC Risk Assessment

- The organisational risk assessment should reflect that bribery and corruption may be linked to fraud and other criminal and inappropriate behaviour and be part of a collective approach to risk. The assessment should be developed around the following principles, identifying and considering critical touch points¹¹ and be applied on an ongoing basis across all activities of the organisation.

- **Commitment:** by the organisation to implement the risk assessment process and ensure sufficient resources are made available.
- **Design:** the assessment should be bespoke to the organisation taking into account its nature and range of activities.
- **Implementation:** ensure it is implemented across the organisation.
- **Monitor and review:** ensure it is a continuous activity within the organisation.
- **Improve:** identify lessons learnt and if applicable feed the learning into the design of the process.
- The organisation may decide to have a separate bribery and corruption risk assessment, or may choose to integrate the risks of bribery and corruption within their overall fraud risk assessment. Where the latter approach is taken bribery and corruption risks, and risks that maybe facilitated by bribery and corruption, should be clearly identifiable.
- The risk assessment should use a range of data and tools to inform the assessment.¹²
- The risk assessment should consider the following factors in determining risk:
 - Geographical spread of organisational activities.
 - Business sector.
 - Transactions.
 - Use of third parties.
 - Scale of critical touch points.
 - Collaborative working between sectors.

11 A critical touch point is where the likelihood of bribery and corruption is at its highest, normally where two entities are present where one is seeking some form of influence from the other.

12 Sources of useful information include the Department for Business, Energy and Industrial Strategy – Business Anti-Corruption Portal, the CIA World Book, Transparency International, Global Witness, OECD, the World Bank and the United Nations.

- The assessment should consider both the impact and likelihood of the identified risk.
- The assessment should assess whether its policies, procedures and controls are adequate to reduce those risks to an acceptable level.
- New procedures and activities should be subject to bribery risk assessment before implementation. This may be part of a wider fraud risk assessment, but where it is it should also consider bribery and corruption risks that do not necessarily lead to fraud.
- The risk assessment process should include a reflection of the value and sensitivity of data generally and specific data sets and address access to, and downloads of, such information. The more valuable the data, the more susceptible those with access to it might be to bribery.
- Risk assessment should include horizon scanning of potential future corruption risks.
- Any assessment of overseas relationships and territories should reflect an assessment of the bribery and corruption risk in that territory.
- Having identified their risks organisations should assess how they might analyse internal information to identify trends, which could suggest bribery. Relevant data will depend on the nature of an organisation's activities but may include comparing:
 - Sources and offers of hospitality with supplier information.
 - Travel and expense claims against work requirements.
 - The number of whistleblowing claims against individuals and within certain business areas.
 - Relationships between private organisations and staff looking to move to such organisations.
- The risk assessment process should

prioritise addressing risks that have been identified in the order of their potential impact.

Control Improvement Plan

- The Control Improvement Plan should include a range of controls to mitigate the risks identified in the CBC Risk Assessment. Controls to mitigate identified risks may include:
 - Publishing a top-level management statement.
 - Publishing and circulating an organisational policy on hospitality/donations/sponsorship/gifts.
 - Disseminating the anti-bribery and corruption policy and statement.
 - Prohibiting facilitation payments.
 - Implementing anti bribery and corruption management system.
 - Defining levels of responsibility.
 - Ensuring anti bribery and corruption terms in contracts.
 - Business associate checks undertaken.
 - Reporting procedures in place.
 - Ensuring due diligence is undertaken throughout the organisations activities.
 - Ensuring anti-bribery and corruption financial controls.
 - Record keeping procedures in place.
 - Introducing anti-bribery and corruption Induction training and guidance.
 - Mandating anti-bribery and corruption e-learning packages.
 - Undertaking targeted anti-bribery and corruption workshops.
 - Communicate the anti-bribery policy and statement.
 - Undertaking a compliance review.

HM Government Bribery and Corruption Assessment Tool

A Bribery and Corruption Assessment Tool¹³ should enable an organisation to review its activity on CBC and assess any gaps.

A standard tool has been developed; the government bribery and corruption self-assessment tool. This takes the user through key questions all organisations will want to consider to better understand and articulate the threat; establish the risks faced; and assess the organisations capacity to manage and mitigate that risk. It sets 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 to develop a more robust approach to CBC activity.

Gift, Hospitality and Entertainment Register

An important control to counter bribery and corruption is the Gift, Hospitality and Entertainment register. The register should be easily accessible to all those associated with the organisation and the format should be in a durable form.¹⁴ The use of the register should be mandatory for all staff; be embedded in processes including the induction into the organisation; and the staff handbook. The register should as a minimum meet the following criteria:

- Detail who should use of the Gift, Hospitality and Entertainment register, to include all employees.¹⁵
- Define when entries in the register should be made e.g. at the time of offer or as

soon as reasonable.

- Ensure all offers¹⁶ are recorded, whether accepted or declined.
- Record the following:
 - Date and time of offer.
 - Who made the offer, name and if applicable details of their organisation.
 - Value of gift, hospitality and entertainment made.
 - If accepted or declined.
- Define if line management approval is required.
- State that the offer of gifts, hospitality and entertainment to employees should normally be refused and only accepted exceptionally when in the business interest.
- Define the audit process of the gift, hospitality and entertainment register.
- If the refusal to accept the gift offered may cause offence, then clear guidance should be available on the process¹⁷ to be followed.
- Detail the financial limits on gifts, hospitality and entertainment that may be accepted.¹⁸
- Ensure sponsorship, charitable and political donations are covered within the policy.
- Detail that the offer and/or the payment of facilitation payments is an offence under the UKBA and the action to be taken if a facilitation payment is requested.
- Detail the action to be taken if free or discounted travel and accommodation are offered.¹⁹
- Detail how records relating to gifts, hospitality and entertainment are to be securely stored and how long they are to be retained.²⁰

13 <https://www.gov.uk/government/publications/bribery-and-corruption-assessment-template>

14 A digital platform should be considered for the register accessible through the organisation's intranet or equivalent.

15 The term 'employee' normally refers to permanent employees, contractors, agency staff and anyone acting on behalf of the organisation.

16 Includes offers made and offers received.

17 Normally the gift is handed to the receiving department for disposal.

18 The limits for gifts, hospitality and entertainment should be kept to an absolute minimum.

19 These should normally be declined unless part of the contractual agreement or part of a joint venture where this is part of the agreement.

20 A period of six years is recommended.

Counter Bribery and Corruption Strategy

- Depending on the risk posed by bribery and corruption, as understood through risk assessment activity, an organisation may decide to either:
 - Have a separate CBC strategy.
 - Incorporate CBC into the overall fraud strategy.
- Where the latter option is taken, the CBC elements of an organisation's fraud strategy should be clearly identifiable.
- Where there is a separate counter bribery and corruption strategy, it should follow the standards for a counter fraud strategy, namely:
 - Clearly define its scope, what parts of the business and its supply chain are/are not covered by the strategy.
 - Define the current 'tactical' challenges that the business is facing in the area. These may include bribery and corruption challenges, key threats and risks, as well as operational, structural, reputational and internal and external challenges.
 - Define the future strategic challenges that the business and fraud function may face. These may include fraud challenges as well as operational, structural, reputational and internal and external challenges.
 - Use tools, such as PESTLE²¹ analysis, to understand the wider environment of the organisation, the sector, associated sectors and administrations and bribery and corruption risk in these contexts.
 - Demonstrate how the organisation's fraud risk assessment/bribery and corruption risk assessment feeds into the strategy.
- Demonstrate an understanding of the key strengths and weaknesses of the current CBC provision and approach.
- Simply present a clear picture of what the aspirational future state is. This should deal with some of the challenges identified.
- Define the time scale that the strategy will cover, who has ownership of it and the date for review.
- Define key activities that will be undertaken to move to the aspirational future state (and/or aspects of it) in the timescale defined.
- Define who the key stakeholders are (this may not be in the strategy itself, it may be in a complimentary document).
- Ensure it uses accessible language and is compelling, in language appropriate to the business, and categorises 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 are and how the organisation will know it is being successful. State where the delivery plan for the strategy is held. This is likely to be the action plan.

Counter Bribery and Corruption Response Plan

- The organisation should have a detailed response plan detailing the actions to be taken when bribery or corruption is suspected.
- This should include the reporting process for bribery internally and to other agencies.
- This response plan is likely to be incorporated into the organisations counter fraud response plan. Where the response for bribery and corruption varies from the approach to fraud this should be specifically referenced.

21 P for Political, E for Economic, S for Social, T for Technological, L for Legal and E for Environmental.

Guidance for Organisations

Introduction

This guidance is designed to present a consistent cross-government approach to counter bribery and corruption and raise the quality of organisations' counter bribery and corruption work and the skills of their individuals. The aim is two-fold; to outline what individuals working in counter bribery and corruption should aim to get in place in their organisation; and for organisations to gain an understanding of what should be in place in particular areas.

They are designed to help organisations identify the research, training and resources needed to develop their capability further. Individuals should use this guidance and competency framework to measure and develop their skills.

This guidance is not intended to cover every eventuality or every specific issue that may arise and should be adapted to the organisation's resources and fraud risk profile

This guidance focuses on organisations' capability to counter bribery and corruption.

Policy

This policy should be embedded across the organisation and implemented in a proportionate way relevant to the risks identified in the organisational risk assessment. The organisation should ensure its staff, and those who work on its behalf, are informed of the organisational policies and have access to them.²²

Top Level Commitment

- There is an active and on-going commitment from top-level management in the organisation, to counter bribery and corruption evidenced through statements, resourcing and embedment.
- There should be a policy of zero tolerance, which is communicated throughout the organisation and to those associated with it.
- Top-level management should make a commitment to high standards of business integrity and communicate this internally and externally.
- Top-level management should appoint a specified senior accountable lead for bribery and corruption. This could be combined with the Counter Fraud lead.
- The Audit Committee, Governance Committee, the Board or equivalent should make an independent assessment of the adequacy of the organisation's counter bribery programme on an annual basis.

Risk Assessment²³

- An organisation should undertake a risk assessment of the bribery and corruption risks throughout all the activities it undertakes. the assessment should review both the ongoing and future activities of the organisation. It should take account of the internal context of the organisation and the environment it operates in and the nature of its activities.

22 For ease of reference these policies are grouped under relevant headings taken from the Ministry of Justice Bribery Act Guidance document.

23 See C4.1 for Risk Assessment Product.

- An organisation should adopt a risk-based approach to managing bribery risks which serves to focus effort where it is needed and will have most impact. Such an approach recognises that the bribery threat to organisations varies across jurisdictions, business sectors, business partners and transactions.

Proportionate Procedures

- The organisation should ensure that all CBC activities are appropriately resourced and are undertaken by those with the requisite skills and knowledge to undertake the activities required.
- An organisation should have a bribery and corruption strategy or a clear reference to bribery and corruption in their fraud strategy.
- CBC policies and procedures should be effectively embedded throughout the organisation, including future proofing new organisational activities.
- The organisation ensures it takes a proportionate response to the bribery and corruption risks faced.
- There should be comprehensive policies and procedures detailing:
 - Gifts and hospitality, covering both the offer and receipt, including that offered but not accepted.
 - Expense policy in place detailing limits, authorities and record keeping.
 - Sponsorship, political and charitable donations.
 - Facilitation payments, it should be emphasised that the payment of a facilitation payment is an offence under the Bribery Act 2010.
 - Interaction with foreign public officials, on the basis that the Bribery Act includes a specific offence of bribery of such an official.
 - Requirements/restrictions on external interests of employees.
- Conflicts of interest, including a set authorisation process for considering specific actions if conflicts are identified.
- Speak-up policies and processes which are accessible both to staff and those who work on behalf of the organisation.
- Controls should be in place to minimise the risk of the threat of internal collusion.
- An organisation's policies should ensure that associated organisations who undertake work on their behalf have effective CBC procedures and that these form part of standard contractual terms. These should detail:
 - Their procedures to counter bribery.
 - The terms of access by the organisation to third party records.
 - Requirements to cooperate if an investigation is undertaken including access terms to documents and individuals involved.
 - Contract restriction, termination and/or removal from future public sector contractor lists if bribery is evidenced.
- Organisations should ensure that they have a whistleblowing policy in place; that it is communicated to its staff and third party organisations it contracts with and their staff if appropriate; it is appropriately used; and that its effectiveness is assessed on a regular basis.
- Preventative measures to counter bribery may be linked to counter fraud and money laundering measures, and actions to deter other criminal offences, as well as those to instil high ethical standards. This is to ensure a seamless approach towards high standards of behaviour across the organisation.
- Organisations should ensure they have a system to record all incidents of bribery and failures of counter bribery controls so that lessons can be learned and controls updated.

- Organisations should ensure all instances of suspected bribery and corruption are responded to and the appropriate action taken.
- There should be an organisational awareness of the specific legislation and civil powers to take sanction, redress and punishment action against those who commit bribery and corruption.
- Organisations should understand the international reach of the US Foreign Corrupt Practices Act 1977 which applies to organisations and persons outside the US who cause directly or through agents a corrupt act to take place within the US.
- Organisations should have a policy supported by procedures detailing when twin track investigations. A combination of criminal, civil, disciplinary and/or regulatory is to be considered.
- There should be a central contact point(s) for those raising queries about bribery related issues or concerns that bribery is taking place. One approach may be separate ethics and whistleblowing lines/ approaches or a combined speaking-up arrangement. Organisations should ensure and evidence that their culture supports an open 'speaking-up' policy.

Due Diligence

- The organisation should ensure it undertakes due diligence on those it does business with and/or undertake activities on its behalf.

Communication and Training

- The organisation should communicate its CBC policies, procedures both internally and externally in an accessible way and should include:
 - Induction material.
 - Accessibility via internal and external facing digital platforms.
 - Staff handbook.
- All staff should receive CBC awareness training, tailored to their role in the organisation and the level of risk they face on a regular basis.
- Successful cases of proven bribery are routinely publicised to raise awareness.

Monitoring and Review

- CBC policies and procedures should be regularly monitored, reviewed and updated.
- Weaknesses identified by review or investigation are considered and guidance and procedures amended as required.

Further Guidance

Further Information

These Professional Standards and Guidance have been created in order to align counter-fraud capability across government.

For further information on the Government Counter Fraud Profession, or to view the other Professional Standards and Guidance available, please visit the Government Counter Fraud Profession page on Civil Service Learning <https://www.gov.uk/government/groups/counter-fraud-standards-and-profession>

If you have any questions surrounding the Government Counter Fraud Profession, and how you can get yourself and your department involved, please contact GCFP@cabinetoffice.gov.uk

Alternatively, the Counter Fraud and Investigation Team in the Government Internal Audit Agency (GIAA) provide a range of services defined in the Government Counter Fraud Framework. They can be contacted to discuss how they are able to assist you to meet your requirements at Correspondence@giaa.gsi.gov.uk

Glossary

Core Disciplines	Areas of expertise knowledge, skills and experience that are needed for an effective counter fraud response. They are not people role or category specific.
Sub Disciplines	Areas of additional knowledge, skills and experience that enhance capability in those areas across a number of core disciplines.
Core Components	Behind each Core and Sub Discipline there are high components outlining knowledge, skills and experience required.
Elements	Specific descriptors of the knowledge, skills and experience required within a core or sub discipline. These are grouped into a Competency Framework document.
Subject Matter Expertise	We will recognise not only technical specialism but also where individuals have deep knowledge in a particular subject for example Tax, Legal Aid or Grant fraud.
Competency Framework	Group of elements found in core or Sub Disciplines. Grouped together, with varying levels of knowledge, skills and experience required.
Competency Levels	Used to identify progression within the standards and competencies, ranging from Trainee, Foundation, Practitioner to Advanced Practitioner.
Categories	Defined combinations of elements, which show the knowledge, skills and experience expected for each core discipline. These enable a common assessment of skills and draw a distinction of those with a level of skill, and those without.
Technical Specialism	Specific focussed areas, usually build off or enhance core disciplines, often the specialism will be the primary focus of their role.



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