



BS 10500 Anti-bribery Management It's your reputation

Your implementation guide

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Background

BS 10500 is the recognized standard for anti-bribery management. It helps organizations put in place measures to address bribery risks in relation to their operations and activities. The standard has evolved from calls at both a national and international level for effective action to be taken to prevent bribery. As such the structure of the BS 10500 management system framework encourages organizations to adopt risk-based policies, procedures and controls in order to avoid potentially corrupt business and demonstrate good governance.

This guide will help you understand that adopting an anti-bribery management system is easier than you think. Working with BSI you can embed the requirements of standard within your organization and as a result demonstrate your commitment to ethical business practices and protect your corporate reputation.



Demonstrating your ethical behaviour

BS 10500 is appropriate for use by all organizations whether in the private, public and voluntary sectors. While it is applicable to all industry sectors, the standard has been of particular interest to organizations in industries with a greater exposure to risk, such as aerospace, chemicals, construction, defence, engineering, healthcare, mining, pharmaceutical and utilities.

Of course the bribery risk facing an organization will vary according to a number of factors such as the size of the business, the countries and sectors in which it operates, and the nature, scale and complexity of its operations. Whilst the standard cannot provide assurance that no bribery has occurred or will take place in relation to the organization, it does establish that the business has implemented reasonable and proportionate measures to mitigate this risk.

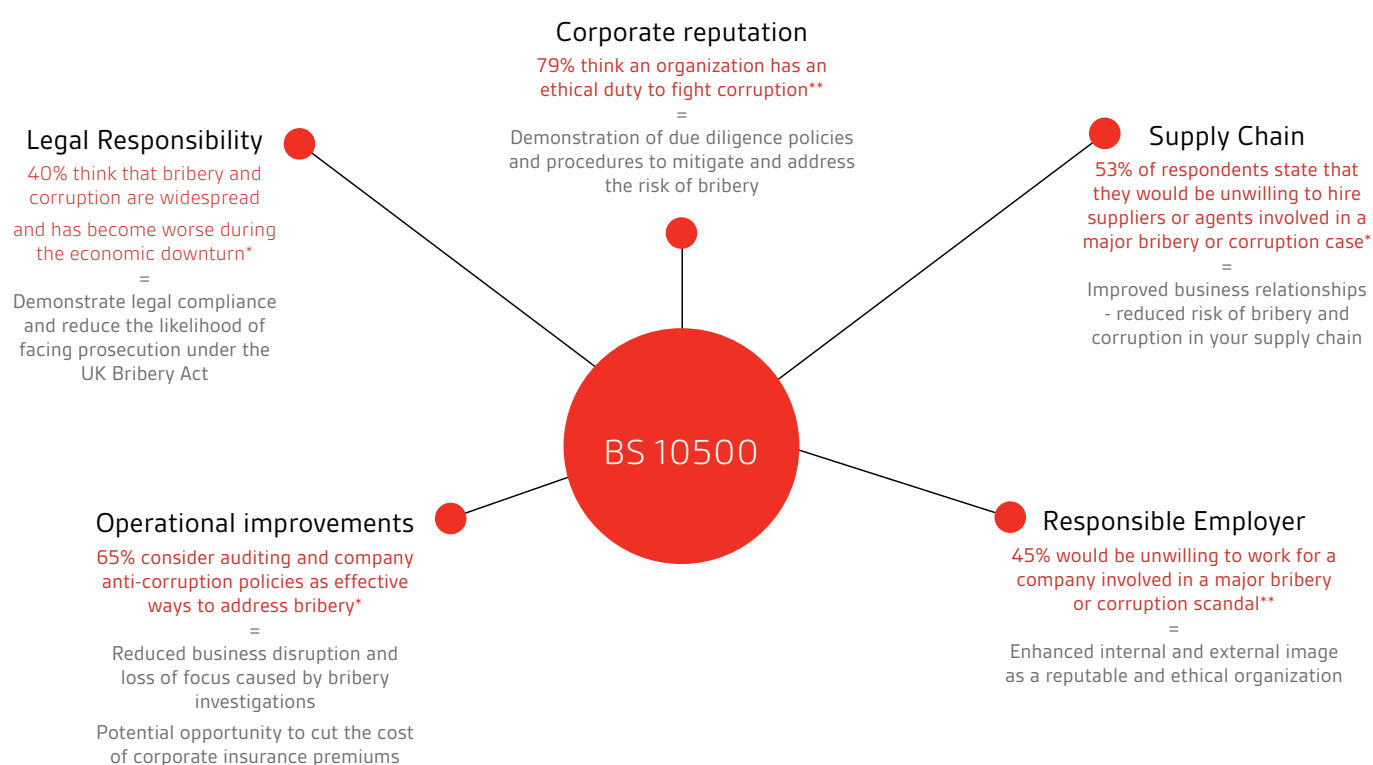
Getting started

Firstly, you need to understand the standard and the task in hand. Purchasing a copy of the BS 10500 standard is the first step.

Next the focus is on appointing a project champion and building a supportive team, as well as ensuring that you get commitment and buy-in to the project from the organization as a whole. It is important that they all understand why you are implementing the system and the wider benefits it will bring.

Learn more about the standards and guides available from BSI [bsigroup.com/shop](https://www.bsigroup.com/shop)

The benefits of implementing an anti-bribery management system



Understanding BS 10500

The costs of bribery are very high for an organization in terms of money wasted, funds misappropriated, projects not properly or safely carried out, business interruption and above all reputational damage.

BS 10500 aims to help organizations implement 'adequate procedures' to address the following bribery risks in relation to an organization's activities:

- Bribery in the public, private and voluntary sectors
- Bribery BY the organization, or by its personnel or others acting on its behalf or for its benefit
- Bribery OF the organization, or by its personnel or others acting on its behalf or for its benefit
- Direct or indirect bribery (eg. a bribe paid or received through or by a third party)
- Bribery within the country in which the organization is based, and bribery in other countries in which the organization operates
- Bribery of any value, whether large or small (including facilitation payments)
- Bribery involving both cash and non-cash advantages (including excessive corporate hospitality)

"Working towards meeting the BS 10500 standard has revealed holes in our existing anti-bribery processes that we were able to plug. The team from BSI have been very supportive in taking us through the standard for this pilot. We look forward to gaining full certification in the future."

Patrick Myers, Myers La Roche



Understanding the Plan-Do-Check-Act principles

The Plan-Do-Check-Act (PDCA) cycle is the operating principle of many management systems standards, including BS 10500. By following this cycle, you can effectively manage and continually improve your organization's effectiveness.

Plan

Establish objectives and draft your plans (analyse your organization's current system, establish overall objectives, set interim targets for review and develop plans to achieve them)

Check

Measure and monitor your actual results against your planned objectives

Do

Implement your plans

Act

Correct and improve your plans to meet and exceed your planned results

Whether you are the managing director setting the direction of the business, or an individual focusing on a specific task, the PDCA cycle is very useful in achieving continual improvement.



Plan – defining your policy, objectives and targets

Planning

Your critical first step is to get top level management committed to the introduction of the anti-bribery management system (ABMS). The organization then needs to:

- Allocate responsibility for planning of the ABMS to an appropriate leader
- Appoint competent personnel to conduct a risk assessment to understand the bribery risks faced by the business
- Assess how the ABMS should be implemented in the organization
- Write the anti-bribery policy
- Design or modify policies, procedures and controls for the ABMS
- Determine the necessary resources to implement the ABMS
- Prepare an implementation plan with clear responsibilities and timelines

Scope of the ABMS

You need to determine the scope of the management system taking into consideration the level of bribery risks faced, the nature and scale of the activities your business undertakes, countries in which the organization operates and what regulatory or contractual obligations you must adhere to.





Do – implementing and living your management system

You now have the commitment and direction from management and the necessary resources to do the job. Now it's time to put your plan into action.

Anti-bribery policy and ABMS

You will need to prepare and adopt an anti-bribery policy. This could simply be a brief statement that communicates your organization's stance on bribery and outlines what you want the ABMS to achieve i.e. to prevent bribery, and if it does occur, ensure it is detected, reported and dealt with accordingly. Your ABMS must be reasonable and proportionate to the complexity of your business and the risks faced.

Communicating the policy and ABMS

Top management needs to ensure communicate the existence of and their support for the anti-bribery policy, the statement and the ABMS. Procedures need to be put in place to record that employees and business associates have read and agree with the policy and statement. Where possible you must also make the policy and statement visible externally, for example via a public website.

Education, training and/or guidance

You must ensure that anyone responsible for implementing the policy, or who are likely to encounter bribery as part of their role, have the appropriate knowledge and training. They must fully understand the impacts and their duties in relation to potential incidents of bribery.

Management responsibility

your senior management needs to define the levels of responsibility and assign a suitably experienced manager to oversee the implementation of the organization's ABMS and ensure ongoing compliance. This may be a shared responsibility where the organization has subsidiaries.

Provision of resources

Make sure that the organization provides the necessary resources, in terms of funding, equipment, materials and people to ensure the ABMS is a success.

Risk assessment

You must have procedures in place to assess the general bribery risks facing your business and whether your system is adequate to reduce identified risks to an acceptable level. These must be frequently revisited in relation to proposed new projects, business associates or international activities and appropriate action taken where the level of risk is unacceptable.

Due diligence

You will need to implement a procedure for undertaking due diligence before entering into a relationship with a business associate if the risk assessment shows that that associate poses more than a negligible risk. This review must be repeated as the relationship develops.



Do – implementing and living your management system

Implementation of an ABMS by controlled organizations and business associates

You must ensure that all organizations over which you have control also implement an ABMS and where you have no control over your business associate and it is reasonable to do so, that steps are taken to require business associates to implement an

Employment procedures

Where possible, your employees should be 'vetted' to gauge whether they are appropriate for employment before joining the organization. They should be given a copy of the policy and declare any conflict of interest which must be recorded.

Your organization should put in place safeguards to avoid unethical behaviour and disciplinary procedures defined for any breach of policy.

Gifts, hospitality and donations

Your policy will prohibit the offer or receipt of such items where they are intended or are likely to impair the independence of the recipient or could be perceived to be for the purpose of bribery.

Facilitation payments

Again the policy should prohibit these and give guidance to employees about the action they should take if this occurs.

Delegated decision making process

Where decision making is delegated your management will need to establish a process based on the perceived risk and value of the transaction.

Anti-bribery contract terms

Make sure you implement procedures and a contract between business associates which includes the prohibition of bribery as far as is reasonable.

Financial, procurement and other commercial controls

Your business will need to implement appropriate controls to minimize the risk of unethical behaviour by any organization or person acting on its behalf.

Raising concerns

You need procedures in place for the confidential reporting of attempted, suspected or actual bribery or any breach of the ABMS to an appropriate person within the organization.

Investigating and dealing with bribery

Your organization will have procedures in place to investigate and take action regarding any detected breach or weakness in the ABMS.

Documenting the ABMS

You will need to keep detailed records of the policies, procedures and controls of the ABMS as well as any actions taken under the management system and issues which arise.

Check and Act – measurement review and improvement

Review by compliance manager

Your company's ABMS must be assessed at regular intervals by the compliance manager to ensure it is adequate to manage potential bribery risks and is being implemented effectively.

Internal audit

Your organization will be required to undertake impartial internal audits on a regular basis to ensure that the business is complying with its ABMS policy and ABMS and ensure that any corrective actions or improvements arising out of the internal audit programme are documented. Unlike other management systems there is no explicit requirement to audit against all of the requirements of the standard. The purpose of the internal audit is to identify any indication of bribery, non-compliance with the policy or ABMS and to highlight any failures or weaknesses.

Top management review

Your senior management needs to ensure the on-going adequacy and effectiveness of the ABMS to the business as it evolves. The review should be based on the compliance manager's report, internal audits undertaken, employees' reports and actual incidences.

Improvement of the ABMS

You will need to define a procedure to continually improve the ABMS as a result of reviews, audits and management reviews. All proposed changes must be assessed by the compliance manager to ensure the effectiveness of the ABMS is not compromised.

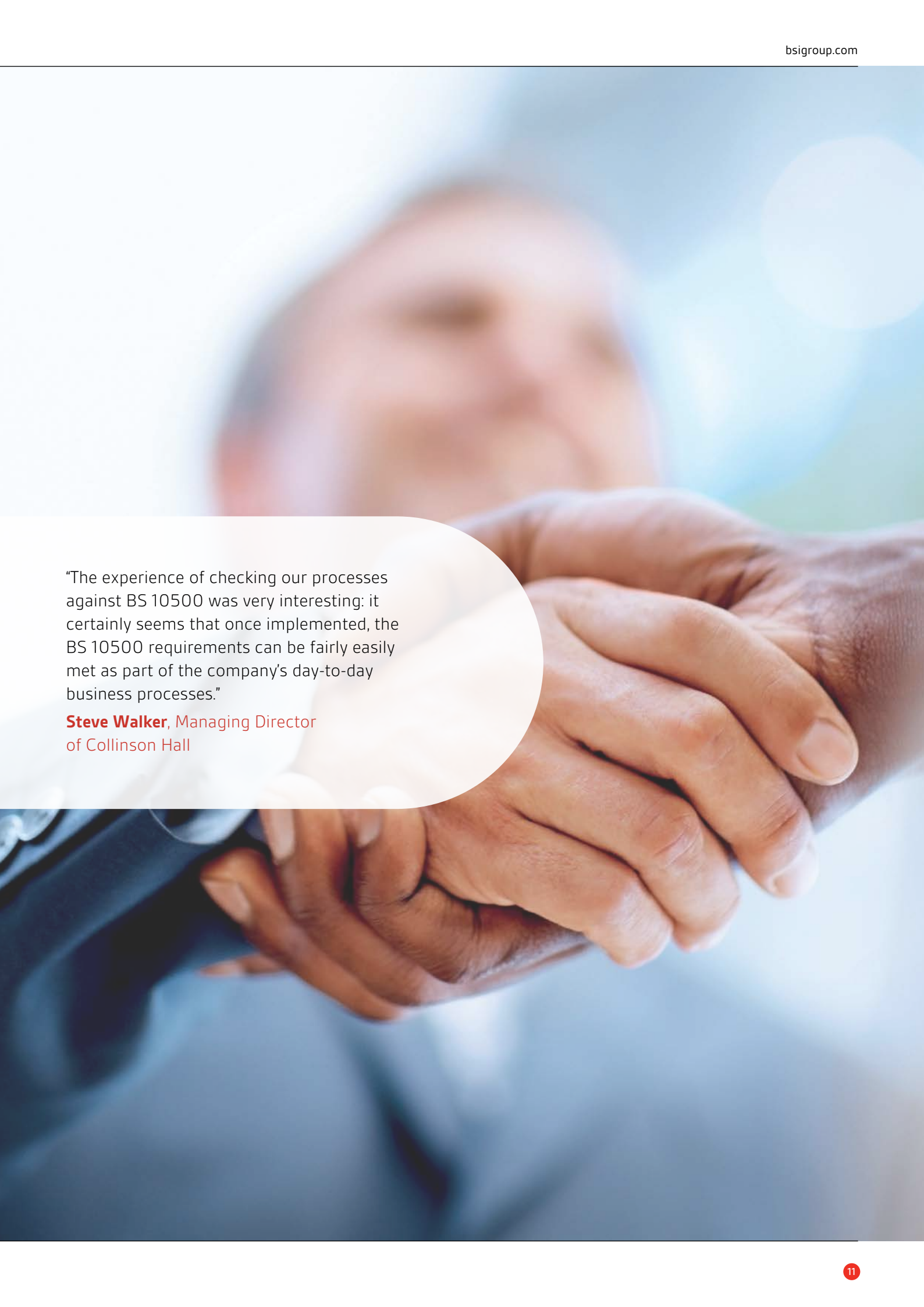
Further guidance on how to establish a successful management system can be found in the Annex of the standard.



10

tips on making BS 10500 work for you

- 1 Top management commitment is vital if the system is to be introduced successfully. Make sure senior managers are actively involved, approve resources and agree the key processes of the business.
- 2 Review systems, policies, procedures and processes you have in place at the moment. Then compare those with what BS 10500 asks for. You may be surprised how much you already do. The standard will allow you to keep the things that work for you while refining those that don't.
- 3 Make sure you have good internal communication channels and processes within the organization. Your employees need to be involved and kept informed of what's going on.
- 4 Give some thought to how departments work together. It's important that the people within your organization don't work in isolation but work as a team for the benefit of the customers and the business.
- 5 Don't ignore the impact that introducing these systems will have on your key stakeholders including suppliers. Speak to them to gain insight as to how they feel improvements could be made.
- 6 Clearly lay out a well-communicated plan of activities and timescales. Make sure everybody understands them and their role in achieving them.
- 7 Consider using your IT systems or software such as BSI's Entropy™ Software to manage your system and documentation more efficiently. The nature and complexity of your documentation will depend on the scope of the system, the size of an organization, the nature of its activities and the organizational culture
- 8 Use competitions and incentives to encourage input – for example an incentive for the first completed anti-bribery process. Make the achievement of BS 10500 engaging and fun. This will increase motivation.
- 9 Train your staff to carry out internal audits of your system. Auditing can help with an individual's development and understanding as well as providing valuable feedback on potential problems and opportunities for improvement.
- 10 And lastly if you feel you are doing something just for the sake of the standard and it doesn't add any value to you as a business – question whether it's necessary.



"The experience of checking our processes against BS 10500 was very interesting: it certainly seems that once implemented, the BS 10500 requirements can be fairly easily met as part of the company's day-to-day business processes."

Steve Walker, Managing Director
of Collinson Hall

The **easy way** to achieve BS 10500

1

Get in touch with us

We can discuss what you need, and recommend the best services for you. We'll then give you a proposal detailing the cost and time involved.

2

Complete our application form

Once we have received your completed form, we'll assign you a dedicated manager who knows your specific industry sector and will be your point of contact throughout the process – and beyond. They'll have an excellent understanding of your business area and will support you as you move forward to the assessment and certification of your anti-bribery management system.

3

Equip your staff with the necessary skills

Whether you're seeking to implement a management system or would like to increase your general awareness of the standard, we have a range of workshops, seminars and training courses available to help you.

4

Consider Entropy™ Software to manage and measure the performance of your system

BSI's web-based solution for Governance, Risk, and Compliance (GRC) allows you to easily manage, track and report all of your key metrics in real-time and gain better control over your management system(s).

5

Gap analysis to make sure you are on track

BSI can carry out an optional gap analysis, also called a Pre-Assessment, of your existing management system against the requirements of BS 10500. That way we can help you identify any omissions or weaknesses that need resolving before formal assessment – saving you time and money.

6

Formal assessment and issue of your BS 10500 certificate

We'll do a two-stage assessment. First an initial review of your management system against the requirements of the standard and then we'll conduct an in-depth on-site assessment to assess your implementation and see how well you have embedded it.

7

Certification and beyond – promote your certificate and your business

Once the assessment has been successfully completed, we'll issue your certificate, clearly explaining the scope of your management system. The certificate is valid for three years. In the meantime your assessor will visit you regularly to help you make sure your business remains compliant and will support you in the continual improvement of your management system.

BSI **supporting** you every step of the way

Giving you the knowledge

BSI's publications draw on a wealth of expert knowledge from across industry. They are particularly useful when you are getting started. Standards and publications can be purchased individually, as a kit, or as part of an annual subscription.

BS 10500:2011 – Specification for an anti-bribery management system (ABMS)

ISO 19011 – guidelines for auditing management systems

These standards and other valuable guides and publications are available from our online shop at [bsigroup.com/shop](https://www.bsigroup.com/shop).

Fast forward with BSI training

BSI has a comprehensive range of training courses. Our introductory courses broaden general awareness of customer focused business practice, and our implementation and auditing courses take that knowledge further to drive change within your organization.

Our training comes in a number of formats: including open schedule courses, in-company training, eLearning modules and distance learning qualifications.

Visit [bsigroup.co.uk/training](https://www.bsigroup.co.uk/training)
or call **+44 845 086 9000** for details.





Entropy™ Software

Demonstrate your ethical behaviour and enhance your reputation with Entropy™ Software

Whether you are starting your journey to certification, currently implementing management systems or have obtained certification already, ensuring you get the most from your investment will be key drivers to your future success.

To experience real, long-term benefits of certification organizations need to ensure on-going compliance to a standard so that it becomes an embedded habit. As the standards expert, BSI makes it easier for our clients to drive continual improvement and deliver long term excellence through our innovative software solution Entropy™ Software.

BSI Entropy™ Software provides a powerful management solution that significantly reduces the cost and effort needed to proactively manage your anti-bribery management system.

Entropy™ Software allows organizations to easily manage, track and report all of your key metrics in real-time, implement and comply with standards such as ISO 9001, ISO 14001 and BS OHSAS 18001 and delivers management effectiveness and efficiencies.

Used globally, by companies of all sizes, Entropy™ Software provides a number of innovative features that can accelerate the time it takes to obtain certification and also drive continual improvement of management systems once certification is achieved.

Composed of five core modules and a base system, Entropy™ Software allows users to add and integrate any number of disciplines into their management process and provides a complete framework in effectively managing risk, audits, performance, incidents, and knowledge across the organization.

For further information
please visit
bsigroup.co.uk/entropy
call **+44 845 080 9000**
or email
info.entropy@bsigroup.com

Use your certificate to promote your business

Independent assessment by BSI will assure you and your key stakeholders that your anti-bribery management system meets the requirements of BS 10500.

Before the formal certification assessments, BSI can perform a gap analysis (a review of what you do compared to the standard's requirements) to help identify the areas that need to be tackled to achieve certification smoothly.

When your certification has been awarded by BSI you have a market differentiator that is recognized worldwide. BSI also works with you to promote your achievement.

Access to Just 4 Customers portal

For more information visit: bsigroup.com/certification or call +44 845 080 9000 now to start your journey to a healthier business.

BSI – supporting you all the way

We know BS 10500; BSI shaped the original standard.

BSI...

- Shaped the original BS 10500 standard
- Has the most highly trained and knowledgeable assessors
- Offers the widest range of support solutions in the market place
- Is the number one certification body in the UK, USA and Korea
- Looks after more than 70,000 global clients
- Has an unrivalled International reputation for excellence

bsi.

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