

# **TRAINING & COMMUNICATION**

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**ANTI-BRIBERY GUIDANCE  
CHAPTER 14**

**Transparency International (TI)** is the world's leading non-governmental anti-corruption organisation. With more than 100 chapters worldwide, TI has extensive global expertise and understanding of corruption.

**Transparency International UK (TI-UK)** is the UK chapter of TI. We raise awareness about corruption; advocate legal and regulatory reform at national and international levels; design practical tools for institutions, individuals and companies wishing to combat corruption; and act as a leading centre of anti-corruption expertise in the UK.

**Acknowledgements:**

We would like to thank DLA Piper, FTI Consulting and the members of the Expert Advisory Committee for advising on the development of the guidance: Andrew Daniels, Anny Tubbs, Fiona Thompson, Harriet Campbell, Julian Glass, Joshua Domb, Sam Millar, Simon Airey, Warwick English and Will White. Special thanks to Jean-Pierre Mean and Moira Andrews.

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Publisher: Transparency International UK  
Design: 89up, Jonathan Le Marquand, Dominic Kavakeb  
Launched: October 2017

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# Transparency International UK's Global Anti-Bribery Guidance

## Best practice for companies operating internationally

This is a guidance section from Transparency International UK's Global Anti-Bribery Guidance. The full guidance is available at [www.antibriberyguidance.org](http://www.antibriberyguidance.org).

### About the Guidance

This flagship guidance presents anti-bribery and corruption best practice for companies, drawing upon expertise from over 120 leading compliance and legal practitioners and Transparency International's extensive global experience.

This free-to-use online portal expands and updates all of TI-UK's Business Integrity guidance over the last decade. This includes our original Adequate Procedures Guidance to the UK Bribery Act; a leading resource for compliance and legal professionals, which has been downloaded over 45,000 times from TI-UK's website. The guidance has been kindly supported by FTI Consulting and DLA Piper.

For each area of practice, we provide a summary, best practice tips, full guidance, and links to further resources. This is a dynamic resource and we will continue to update it with new content and features. If you have anything you would like further guidance on, or other suggestions, please do contact us at [businessintegrity@transparency.org.uk](mailto:businessintegrity@transparency.org.uk)

Many companies are facing increased bribery risks as they continue to expand internationally and become increasingly reliant on diffuse supply chains and complex third-party networks. There are also additional risks around stakeholder expectations, a global strengthening of anti-bribery legislation – requiring better internal mechanisms to ensure compliance – and enhanced enforcement.

Companies will always design their own bribery programme according to their particular circumstances but those following this guidance can take reasonable assurance that they are well positioned to counter risks of bribery, comply with anti-bribery legislation in jurisdictions across the world and to act ethically and positively in the markets in which they operate.

### Transparency International UK's Business Integrity Programme

The goal of our Business Integrity Programme is to raise anti-corruption standards in the private sector. We aim to ensure that individuals and organisations do not participate in, enable or endorse corruption. Our approach is to engage positively with the private sector, governments and leading anti-corruption initiatives to identify and advocate best practice.

For more information, please visit <http://www.transparency.org.uk/our-work/business-integrity/business-integrity-forum/>

# QUICK READ

Engaging with employees in innovative and integrated ways will help maintain a culture of integrity

Internal communication and training are essential in providing the necessary information, knowledge and skills to directors and employees in relation to the anti-bribery programme. They should bring to life the provisions set out in the company's code of conduct and the anti-bribery policies and procedures.

Engagement with employees through surveys, focus groups and dialogue with line managers can further deepen the way the company interacts with employees on its anti-bribery programme. The company's leadership should reinforce messages with a strong tone from the top (see Chapter 1) and from line managers who have an important role in representing and communicating the anti-bribery programme.

## Key elements of best practice

- **Integrated:** Take an integrated approach to all aspects of anti-corruption employee engagement to ensure that employees receive consistent messaging and advice across: training, advice and whistleblowing channels, line management and departmental communications, incentives, appraisal, and recognition.
- **Tailored communications and training:** Implement tailored communications and training based on risk assessments of where bribery is most likely to be encountered by employees. Tailor training to local cultures and needs.
- **Appropriate messages:** Convey anti-bribery messages that are seen by employees as appropriate, attainable and which will build confidence and trust in the company and its integrity.
- **Appraisal:** Build compliance with the anti-corruption programme and completion of training into the appraisal procedure and ensure personnel files document training needs and training received.
- **Continuous improvement:** Encourage employees to make suggestions for improving anti-corruption internal controls and procedures.

# BEST PRACTICE

- **Integrated:** Take an integrated approach to all aspects of anti-corruption employee engagement including education, training, advice and whistleblowing channels, line management and departmental communications, incentives, and appraisals.
- **Consistent:** Provide consistent messages whatever the channel and this includes those given in external engagement and public reporting (see Chapter 18).
- **Practical:** Translate the anti-bribery programme into practical guidance and training relevant to all employees in their work.
- **Cross-functional working:** Ensure that legal, compliance, human resources, and business units work together in planning communications, training and delivery.
- **General training:** Ensure that all employees, board members and contractors receive a foundation level of anti-bribery communications and training.
- **Tailored communications and training:** Implement tailored communications and training based on risk assessments of where bribery is most likely to be encountered by employees.
- **Clarity:** State clearly, consistently and accessibly across the company, the values, anti-bribery policies, procedures and expectations.
- **Two-way:** Recognise that engagement with employees is a two way process.
- **Surveys and interviews:** Conduct interviews with employees and board members to determine their perceptions and needs.
- **Orientation:** Ensure that new recruits (including appointments to the Board) are given induction/orientation training on the anti-bribery programme and that intermediaries are also given training following their appointment.
- **Appropriate messages:** Convey anti-bribery messages that are seen by employees as appropriate, attainable and which build confidence and trust in the company and its integrity.
- **Positioning:** Keep the anti-bribery messages alive and at the forefront of employees' minds through means such as line management and departmental initiatives and promotions.
- **Use scenarios:** Use scenarios, case studies and dilemmas as these are valuable in stimulating alertness to risks, along with provoking thought on approaches to use and how to deal with the grey areas likely to be encountered.
- **Be clear on exceptions:** Clear guidance needs to be given on situations when exceptions may be justified (for instance when bribe demands are accompanied by the threat to life, limb or liberty of the employee or to another person).
- **Localise:** Tailor training to local cultures and needs. In addition, as part of tone from the top, board members and senior management will convey the corporate anti-corruption commitment in local communications and by attending local training sessions.

- **Tone from the top:** Involve directors and senior management in the training to reinforce the company's commitment to integrity and countering bribery.
- **Use experts:** Draw on the expertise and real-life experience of managers, employees and industry experts.
- **Evaluate:** Monitor systematically the delivery of training to find out what works and what could be improved.
- **Measure opinions:** Gather, evaluate and use information (including results of employee surveys) on awareness and understanding of the programme. Check employees' confidence in their ability to handle bribery risks, and views on the company's values.
- **Continuous improvement:** Provide incentive schemes for employees to make suggestions for improving anti-corruption internal controls and procedures.
- **Appraisal:** Build compliance with the anti-corruption programme and completion of training into the appraisal procedure and ensure employee records document training needs and training received.
- **Document:** Record the company's training given as this will shape future training plans and also serve as evidence of the adequacy of the company's anti-bribery programme.

# GUIDANCE

## 14.1 Introduction

**Aim: To develop an integrated approach for internal communications, training and engagement to support and facilitate the company's anti-bribery commitment.**

Internal communication and training have traditionally been the main ways in which companies can convey the anti-bribery policy and programme to all employees. Now, companies are recognising the value of taking a comprehensive and integrated approach to employee engagement. An integrated approach brings together all aspects of engagement with employees across their activities with the company. For example, this includes the following aspects listed below:

- On-boarding
- Internal communications
- Training
- Encouraging quality, excellence and continuous improvement
- Remuneration and incentives
- Appraisal and recognition
- Access to advice and ability to raise concerns
- Disciplinary processes
- Exit or termination

Companies which integrate their anti-bribery engagement with employees in innovative ways are in a better position to expect that those employees' will act with integrity, which reduces the likelihood of bribery occurring. The compliance and/or legal functions, supported by human resources, should:

- identify the training needs of employees
- design training, including key messages
- maintain personnel records
- ensure appropriate employee recognition
- determine the role of line management in the engagement

The methods of anti-bribery communications and training are long-established with content and delivery generally developed in-house and/or by numerous external providers. Innovation is now taking place as companies explore how to shift the tone and focus of delivery. A 'command' approach can fall short as this method can fail to capture the interest or buy-in of employees. Instead, companies want employees to be committed to, and engaged with, the anti-bribery programme; to be proactive and creative in identifying weaknesses, suggesting improvements and conveying a strong message externally when representing the company.

The challenge for companies is how to enrich the content and delivery to ensure that the anti-bribery message is high on each person's agenda, among all other important messages for employees.

Codes of conduct, policies and procedures, and business conduct guidelines will set out the company's stance and expectations on values, standards and behaviour, but these are often not read fully or understood. Simply asking employees to sign that they have read and understood the relevant document is not enough. The company needs to ensure that its anti-bribery policies are properly embedded in its working practices and that continuous improvement is encouraged and recognised.

**Internal communication and training should aim to ensure that employees:**

- Know what bribery is and how to recognise it.
- Know about particular transactional risk areas and how to handle them.
- Understand the relevant laws.
- Know what to do when confronted with situations where bribes are requested.
- Understand the wider issues relating to bribery including the potential adverse impacts of bribery on: the company, employees and societies.
- Are committed to the company's culture of integrity.
- Will act in the right way.
- Understand what they must do contractually.
- Have trust in the company.
- Contribute to continuous improvement.
- Know they will be recognised by the company for their commitment.
- Know they will be measured on compliance when remuneration levels are evaluated.
- Understand the potential consequences for the company and for the employee when things go wrong.
- Are aware of how things can go wrong, including error and negligence.
- Know where and how to get more information.
- Know how to raise concerns.
- Understand that the company will protect and support employees who refuse to pay bribes or whistleblow.



- Are encouraged to take continuing interest in updates on this subject.
- Critically examine their day-to-day activities and propose solutions or improvements to processes.
- Understand the importance of their role as 'Integrity ambassadors for the company'

It is crucial to measure the effectiveness of communications and training in order to then have a basis for improvement of these activities. Plans and targets should be set for measuring employee understanding of, and attitudes to: behaving with integrity, the anti-bribery programme, trust in the company, and the company's integrity.

### Examples of corporate approaches to internal communication and training:

- Intel click [here](#)
- Vodafone click [here](#)

## 14.2 Internal communication

Internal communication, such as general communications, promotional materials and targeted campaigns, provides employees with essential baseline information on the company's anti-bribery commitment while also raising awareness and understanding of the anti-bribery programme. A wide range of channels can be used including: websites, intranet, social media, mobile technology, postings on bulletin boards or walls, handbooks, employee manuals, newsletters, employee meetings, suggestion schemes, advice and helplines. The content and language of communications should be adapted to reflect varying audiences, localities and countries.

## 14.3 Line management

The anti-bribery programme and related messages can be communicated by line management and this should also enable discussions on key issues. Feedback and concerns voiced at discussions should be noted and provided to the compliance function in order to contribute to improving the anti-bribery programme. The approach should be to build the trust and confidence of employees in their right and access to voice and discuss concerns on anti-bribery issues with management.

In the first instance, the aim of the company should be to encourage employees to raise matters with their line manager or the compliance or ethics officer. This may be supplemented by giving the employees the right and protection to enable them to use a 'leapfrog' approach where they can jump management levels to voice and discuss concerns in situations where they are not comfortable speaking to their line manager. Regular opportunities should be provided to enable employees to engage in free and open discussion in relation to the anti-bribery programme and potential risks of non-conformance.

This can be through online training, scheduled meetings, education courses, focus groups and employee appraisals.

## 14.4 Training

Basic training on the anti-bribery programme should be given to all employees and board members, most likely as part of wider training on the company's code of conduct. In addition, dedicated, and tailored anti-bribery training should be given to those in high risk functions.

Training should provide an understanding of what constitutes bribery, while also providing information in relation to improper practices and likely risk areas. It should aid recognition of how bribery demands take place and set out how to respond. The training should ultimately support the development of skills to avoid or resist demands or solicitation for bribery. The training should also build employees' confidence and trust in, and commitment to, the integrity of the company. In this way the company can encourage employees to act as 'integrity ambassadors', representing and promoting the company's commitment through their actions.

The delivery of training can be facilitated through a range of training methods including: intranet, remote e-learning, external courses, seminars and conferences, and publications and training materials. Face-to-face training is vitally important as it communicates directly the company's commitment, the significance of bribery risks and how to counter them, and is much more effective than remote e-learning. This can be delivered by either internal or external trainers. It is also important as it provides employees the chance to discuss topics and concerns with well-prepared instructors and experienced managers. The employee discussions can also contribute to the improvement of the anti-bribery programme. Suggestions and concerns should be captured and fed back to the compliance function. Employees should then be assessed at the culmination of the training (for example, by a multiple choice questionnaire) so that they can demonstrate their understanding.

Courses and other training delivery methods should also be evaluated to test the quality and value of the content, and whether it has led to any substantive changes in the way employees operate. This may be difficult to measure but feedback should be gained from managers as to whether they have seen any evidence of changes. The delivery of training should also be monitored and documented. The employees' personnel files should be updated to record their attendance at the training and a process should be put in place to ensure that they receive regular refresher training.

### Free online training for SMEs

The costs of anti-bribery communications and training may seem prohibitive for SMEs but there are ways of reducing the cost. This can be by focusing activities on the areas of highest risk, and using communication and training techniques such as video and interactive media. Larger companies, particularly clients of SMEs, may be able to provide support.

Transparency International UK has also provided a free online training resource, available at <http://www.doingbusinesswithoutbribery.com/> This free 1.5 hour online learning module provides comprehensive anti-corruption training designed by leading experts in the field, and enables organisations to provide training for all their personnel.

## 14.5 Training the board

Training should also be provided to board members. This will be designed to reflect their fiduciary and statutory responsibilities and is vital in order to enable them to have the skills and knowledge to carry out their role in providing leadership, addressing risks, building the company's culture of integrity and governance and providing tone from the top. At the same time, the training will need to be sensitive to the time demands on board members while also being conscious that they may be over confident about their knowledge on these training topics.

### Board training content can include:

- The external environment for anti-corruption including changes in legislation, recent cases (including fines) and emerging trends.
- The aspects of the main relevant laws, including any personal liability.
- Related statutory responsibilities of directors.
- High level discussion on topics such as integrity culture, B20 and other inter-governmental initiatives.
- Independent assessment role of the board and its committees.
- How the company culture is managed and assessments of its status.
- The implications of the company's risk approach.
- The risk assessment methodology.
- The results of assessments.
- The key identified risks and any residual risks.
- How risks are mitigated.
- The methodologies for reviews and audits and the results.
- Specific aspects of the anti-bribery programme related to directors' activities including conflicts of interest, the 'revolving door', gifts, hospitality and expenses, lobbying.
- Where to seek advice.

# CHAPTER APPENDIX

## 14.6.1 Example: Intel's integrated anti-bribery engagement programme

'At Intel innovation is core to everything we do; our Ethics & Legal Compliance team strives to inspire our employees through cutting-edge educational programs.' Jo Levy, Chief Compliance Officer, Intel', 2016.

Intel arranges anti-corruption communication campaigns around International Anti-Corruption Day. In 2015, this engaged an employee population of approximately 110,000 with a multi-day campaign designed to empower employees to take a leadership role in the conversation about bribery and compliance. The program leveraged journalism, social media, employee-generated content, gaming and peer-group participation for immediate feedback and to socialize learning.

'Ethics and Compliance Business Champions serve as the liaisons for the Ethics and Legal Compliance group in business groups and sites across the company. They are responsible for advocating and monitoring ethics and compliance, helping drive corporate initiatives, and serving as local experts.

The 2015 anti-corruption awareness campaign included an online selfie contest open to all employees and generated over 20,000 unique views. The company arranges an Ethics and Legal Compliance Group speaker series and a newsletter which serves to educate Champions on trends in areas such as conflicts of interest, privacy and security, antitrust, insider trading, product regulations and standards, anti-corruption, and export compliance. Through an Intel Ethics and Compliance Excellence Awards program, launched in 2010, the company regularly recognises teams and individual employees for their contributions to ensure Intel's ethical and compliant environment. In 2015, five teams and individuals received the award. In addition, as part of an internal employee recognition program, employees regularly honour their peers for role modelling Intel values. Each quarter, thousands of employees recognize each other for demonstrating uncompromising integrity in their day-to-day work at Intel.'

[Intel Corporate Responsibility Report 2015](#)

## 14.6.2 Example: Vodafone's Doing What's Right programme

'We want to maintain a culture where employees do the right thing automatically, not just because they were told they have to or because they are afraid of potential consequences. Employees across the Group receive regular communications, online refresher training, face-to-face sessions and team briefings on various aspects of our compliance programme, depending on their role. The Code of Conduct learning and awareness programme, Doing What's Right, is designed to help employees across the Group understand their responsibilities to our people, partners and shareholders. Through this programme, employees complete e-learning courses every two years on the Code of Conduct, anti-bribery, privacy, competition law and customer data security. Line managers attend face-to-face briefings from our senior leaders on the key topics of Vodafone's Code of Conduct and their role as a people manager.

The Doing What's Right programme is rolled out to new employees as early as possible when they join Vodafone, so that they are clear on our standards from the start. This applies to employees joining us through acquisitions as well as new starters.'

**Communication and training:** 'Our anti-bribery policy is included in our Code of Conduct and promoted on a dedicated intranet page with clear and concise guidance. It is supported by a global training and communication programme that includes an anti-bribery e-learning tool available to all employees. Face-to-face workshops in all our markets help to ensure that employees working in higher-risk areas (such as procurement, enterprise and government relations) have a practical understanding of the key issues. In 2014/15, our global Doing What's Right programme included communications on our Code of Conduct and offered additional training for line managers on our main policies, including anti-bribery. To promote further engagement with our policies, we maintain a community webpage on our internal social media site, Circle, which allows users to post short updates and links to useful documents and websites and to seek advice where required.'

<https://www.vodafone.com/content/sustainabilityreport/2015/index/operating-responsibly/ethics.html>

Accessed 31 October 2016

# RESOURCES

[\*Doing Business without Bribery, Transparency International UK, 2013.\*](#)

This is a free online 1.5 hours learning module providing comprehensive anti-bribery training designed by leading experts in the field. It also can enable companies to benchmark their own training programmes against a best practice standard.

[See also TI-UK's Trainer's Handbook](#)

[\*How to Bribe: A Typology of Bribe Paying and How to Stop It, Transparency International UK, 2014.\*](#)

Drawing upon Transparency International's global experience, this publication provides legal cases and real-life stories to illustrate how bribes are paid in practice. From excessive hospitality to offshore agreements, *How to Bribe* is designed to help individuals and companies anticipate, recognise, avoid, and resist bribery.

[\*RESIST: resisting extortion and solicitation in international transactions. A company tool for employee training, Transparency International and others, 2012.\*](#)

[\*The Fight Against Corruption: E-Learning Tool, UN Global Compact\*](#)

An online learning platform to obtain practical guidance on how to fight corruption in all forms through six interactive-video dilemma scenario

# Training services from Transparency International UK

Effective anti-bribery and corruption training must resonate with staff. Employees need to understand what anti-corruption means and why it is important, and to make a personal commitment to behave in an ethical way.

As the world's leading anti-corruption NGO, TI-UK has been fighting corruption globally for more than 25 years and has a special insight into the impact of corruption on economies, societies and ordinary people's lives. TI-UK provides its experience and expertise to companies either as part of in-house staff training programmes or through stand-alone training courses.

We can assist you with general and tailored anti-bribery and corruption training

## General anti-bribery and corruption training

For example:

- Staff training sessions, such as training for sales staff or inductions for other staff who might be exposed to corruption risks in their line of work
- Talks at staff conferences or team building events to help build awareness of the importance of countering bribery and corruption

## Tailored training

Expert perspectives can be given on a range of topics, such as:

- Using agents and intermediaries
- Managing supply chains
- Performing due diligence for mergers and acquisitions
- Developing Adequate Procedures to comply with the UK Bribery Act

Typically, the specialist training courses are aimed at:

- Compliance teams, within organisations of all sizes and across all sectors
- Corporate affairs
- Senior and expatriate management

For more information on courses or to discuss training requirements, contact [training@transparency.org.uk](mailto:training@transparency.org.uk).

