



GIACC

Global Infrastructure Anti-Corruption Centre



EN



Communicating the Anti-Corruption Policy and Programme EN

This section provides guidance in relation to an organisation communicating the anti-corruption policy and programme (Measure 4 of the [Anti-Corruption Programme for Organisations](https://giaccentre.org/programme-organisations/) (<https://giaccentre.org/programme-organisations/>)).

The purpose of this measure is to ensure that all personnel are aware of the anti-corruption policy and programme, and are aware that the organisation's top management is committed to the policy and programme and requires personnel to comply. The policy and programme will not be effective if personnel are unaware of them, or do not believe that they are fully supported by the top management.

There are three components to this measure:

- **Leadership commitment:** The chief executive (or equivalent top manager) of the organisation should issue a written statement to personnel confirming the board's support for the anti-corruption policy and programme. This personalises the board's commitment. It shows that the top manager of the organisation is committed to the policy and programme. See sample [Statement of Support](https://giaccentre.org/chess_info/uploads/2019/10/GIACC.WEBSITE.STATEMENTOFSUPPORT.docx) (https://giaccentre.org/chess_info/uploads/2019/10/GIACC.WEBSITE.STATEMENTOFSUPPORT.docx) Ideally, the top manager should re-affirm this support by re-issuing a statement of this nature annually.
- **Communication:** Both the top manager's statement of support and the anti-corruption policy:
 - Should be communicated to all personnel. This could be by e-mail, or by hard copy letter. It should be provided to all existing personnel and to all new personnel upon their joining the organisation. And
 - Should be published on the organisation's website. This could be in a separate section of the organisation's web-site which deals with ethics or compliance.
- **Personnel confirmation:** All personnel should be required to sign a document that they have received, read and understood the anti-corruption policy, and will comply with it. See sample [Compliance Declaration](https://giaccentre.org/chess_info/uploads/2019/10/GIACC.WEBSITE.COMPLIANCEDECLARATION.docx) (https://giaccentre.org/chess_info/uploads/2019/10/GIACC.WEBSITE.COMPLIANCEDECLARATION.docx).

All of the statement of support, anti-corruption policy and personnel confirmations should be dated so that it is clear when they were published or agreed to.

It is important that the organisation can efficiently keep track of those personnel who have received the anti-corruption policy, those who have signed the compliance declaration, and those who have not (so that the organisation can follow up in relation to those personnel who have not received the policy or who have not signed the declaration). There are various ways in which the organisation can manage and monitor these arrangements:

- The policy may be sent out in hard copy to all personnel, with an accompanying form which the personnel must sign and return.
- The policy may be sent out electronically to all personnel (with automatic receipt set up on the e-mail system, and the personnel can be asked to return electronically their declaration).
- The policy can be part of an online training module (see measure 8) which personnel are required to take, and the module could have the declaration at the end which the personnel must tick to confirm acceptance. The completion of the training module and the personnel's declaration could be automatically recorded by the organisation.

The anti-corruption programme requirements which support the policy are likely to be contained in a wide range of documentation and controls (see Measures 3 to 21). These may change periodically as they are updated and improved. Not all programme requirements will be relevant to all personnel (for example, project management controls may only be relevant to project managers). It would be likely to be too cumbersome to require all programme requirements to be sent out to all personnel and to be signed by personnel in the same way as the policy above. So, an effective method of communication of the relevant programme requirements must be implemented so that all personnel are aware of the programme requirements relevant to them. Appropriate training or instruction should be given to relevant personnel so that they are aware of how to implement the programme requirements relevant to them.



Implementation checklist for Measure 4

1. The chief executive (or equivalent top manager) of the organisation should prepare a written statement to personnel confirming the board's support for the anti-corruption policy and programme. See sample [Statement of Support](#) (https://giaccentre.org/chess_info/uploads/2019/10/GIACC.WEBSITE.STATEMENTOFSUPPORT.docx) to personnel.
2. Both the top manager's statement of support and the anti-corruption policy should be communicated to all personnel (see suggested communication methods in above guidance).
3. Both the top manager's statement of support and the anti-corruption policy should be published on the organisation's website. This could be in a separate section of the organisation's web-site which deals with ethics or compliance.
4. A procedure should be implemented under which all personnel are required to sign a document that they have received, read and understood the anti-corruption policy, and will comply with it. (See suggested methods of achieving this commitment in above guidance.) See sample [Compliance Declaration](#) (https://giaccentre.org/chess_info/uploads/2019/10/GIACC.WEBSITE.COMPLIANCEDECLARATION.docx) by personnel
5. A procedure should be implemented so that personnel are aware of and understand the parts of the anti-corruption programme which are relevant to them.

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