

**CERTIFICATION:**  
**ISO 37001**  
Anti-Corruption Management Systems



**TARGET ORGANISATIONS**

The ISO 37001 standard:

- Applies to all organisations, both public and private, in Italy and abroad
- Provides the requirements for implementing an anti-corruption management system to improve compliance control over active and passive corruption (Anti-Corruption Plans pursuant to Italian Law 190/2012 as amended, and MOG (organisation, management and control model) for the prevention of potential corruption offences pursuant to Italian Legislative Decree 231/2001)
- Fully integrates with the latest edition of ISO 9001:2015

**THE CONTEXT**

Recent years have seen a change in policy/legislation regarding anti-corruption guidelines. The instruments introduced with Italian Law 190/2012 (Three-Year Corruption Prevention Plan) and Italian Legislative Decree 33/2013 (Transparency) reflect a different approach that recognises that it is more effective to prevent corruption than to repress it. This approach requires the same bodies and companies (in the public sector) to plan and prepare adequate measures to control and prevent the risks of corruption. At the same time, the dissemination and recognition of

organisational models (in accordance with Italian Legislative Decree 231/2001) that comply with the OHSAS 18001 standard for health and safety and the ISO 14001 standard for the environment have confirmed that the standards of voluntary systems are a valid and effective criterion for auditing the prevention system of companies. Finally, the recent reform of the Public Procurement Code, which emphasises voluntary certification, should be seen as evidence of the criterion required by the contracting authority.

**THE SERVICE**

As with any system standard, ISO 37001 certification is awarded following a successful audit, showing compliance with the standard's requirements. The audits are carried out on a sample basis and include the analysis of documents and interviews. In addition to issuing the certificate, the aim of the service is to identify possible areas of improvement that the organisation can pursue. The certificate is valid for three years and is subject to annual maintenance audits.

If the organisation implements a certified ISO 9001 management system, it is advisable to integrate the two systems (ISO 9001 and ISO 37001) and conduct joint certification audits to optimise time and resources.

## BENEFITS

- It allows better control of the risks of corruption (active and passive) arising from the organisation's activities, ensuring the effectiveness and improvement of the anti-corruption system and the measures that form part of it (Anti-Corruption Plans pursuant to Italian Law 190/2012; Organisational Models pursuant to Italian Legislative Decree 231/2001) through the monitoring of objectives, performance and periodic review of the system. This aspect was also highlighted by ANAC as part of the National 2016 Anti-Corruption Plan.
- It facilitates dissemination, sharing and integration of anti-corruption systems into the organisation's processes.
- It is a suitable and internationally recognised benchmark for the part of the company's 231 Organisational Model concerning the prevention of corruption offences (similarly to standard OHSAS 18001 for occupational health and safety), which can, therefore, make it easier to prove the Model's existence and effectiveness.
- It improves reporting and communication of information about the organisation's commitment to fighting corruption to all stakeholders (citizens, users, customers, employees, partners and shareholders, suppliers, institutions, public authorities, competitors...) in a manner consistent with the principles of social responsibility.
- It constitutes a means of proof that the company's system meets the requirements and criteria on legality and control of corruption risks laid down in the new procurement code (Legislative Decree 50/2016).
- It can be easily integrated with ISO 9001:2015.
- For public and private organisations that have adopted legal instruments for the prevention and control of corruption risks (anti-corruption plans; organisational models for the prevention of corruption offences) and apply management systems that comply with ISO standards (e.g. ISO 9001:2015), the transition to an ISO 37001 management system may not be particularly complicated, especially in terms of documentation. In fact, these instruments are inspired by the same approach as an ISO 37001 anti-corruption system and have several key elements in common: context analysis, risk assessment, planning and implementation of control measures, organisational structure for compliance, resources to support, surveillance and monitoring.

## CERTIFICATION PROCESS

It is necessary for the organisation to have defined its ISO 37001 management system at a documentary level and to have reached a sufficient and necessary level of implementation to face the certification audit, which is divided into two phases.

In the first phase, the audit team appointed by the certification body audits the available documentation and the requirements for the surveillance and review of the system, and assesses whether the state of implementation of the anti-corruption management system allows it to proceed to the second phase, which is a more operational audit of the organisation's activities.

In the second phase, in addition to verifying the resolution of any previously identified deficiencies, the operational management and control of corruption risks, monitoring and surveillance of the system and compliance with the requirements of ISO 37001 will be further explored through interviews and site visits to the organisation's headquarters and offices. If the second phase audits are successful, the body will issue the ISO 37001 certificate.