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# Anti-Corruption Programme Design for Senior Leaders Training Course

3 – 7 May 2027  
Rome





## Anti-Corruption Programme Design for Senior Leaders Training Course

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### Programme Summary

Anti-corruption programme design is the subject of this one-week training course for compliance heads, directors and senior public officials at a strategic level, ending in an anti-corruption programme blueprint for one organisation. Corruption risk is often handled through scattered policies that nobody tests. The programme moves from international principles, through diagnosis of exposure and control gaps, to the design of controls and oversight, then to application in one organisation. Mars Training Centre UK delivers this programme in anti-corruption programme design.

### The Business Case

An organisation that cannot show how it prevents, detects and responds to bribery and abuse of office carries legal, financial and reputational exposure at every level. Leaders who design the programme deliberately, assign owners and test the controls can explain their decisions to a board, an auditor or an investigator.

- Bribery Exposure: Falls when risks are assessed by process, market and intermediary and controls are matched to them.
- Detection Time: Shortens as reporting channels, red flags and escalation routes are agreed before an event.
- Oversight Quality: Improves when boards and committees receive a fixed set of integrity indicators.

### Principles and Evidence Base

- United Nations Convention against Corruption: It frames the preventive measures, integrity duties and reporting expectations examined in Session 1.
- OECD Anti-Bribery Convention: It informs how bribery of foreign public officials and the liability of organisations are treated in the exposure review of Session 2.
- ISO 37001 anti-bribery management systems: Its structure of leadership commitment, risk assessment, due diligence, controls and monitoring shapes the design work in Session 3.

### Intended Participants

- Compliance leaders who own the integrity programme and must evidence that it works.
- Directors and committee members who oversee corruption risk and approve the programme.
- Senior public officials who set integrity rules for agencies, procurement and licensing decisions.
- Heads of legal, audit and procurement who carry out controls or test them.

The programme serves banks, energy and infrastructure companies, public agencies and state-owned enterprises.



## Learning Outcomes

1. Participants will be able to evaluate an organisation's integrity arrangements against international anti-corruption and anti-bribery standards.
2. Participants will be able to diagnose corruption exposure by process, counterparty and decision point.
3. Participants will be able to construct controls for gifts, conflicts of interest, third parties and facilitation payments.
4. Participants will be able to design reporting, investigation referral and consequence arrangements that people trust.
5. Participants will be able to prioritise programme actions by exposure and by the effort each needs.
6. Participants will be able to justify an anti-corruption blueprint and its indicators to a board or ministerial sponsor.

## Programme Structure

### Day 1: Anti-Corruption Programme Principles and International Standards

What must an anti-corruption programme achieve, and which standards set the expectation?

- United Nations Convention against Corruption Preventive Measures
- OECD Anti-Bribery Convention Principles
- ISO 37001 Management System Structure
- Leadership Commitment Statement
- Corruption Forms and Definitions Map

### Day 2: Diagnosing Corruption Exposure and Control Gaps

Where is the organisation most exposed, and which controls fail to cover it?

- Process and Counterparty Risk Assessment
- Red Flag Indicator Library
- Gifts and Hospitality Register Review
- Conflict of Interest Declaration Sample Check
- Control Gap Heat Map

### Day 3: Designing Controls, Due Diligence and Oversight

Which controls and decision rights reduce the exposure found?

- Third-Party Due Diligence Tiering
- Gifts, Hospitality and Facilitation Payment Rules
- Conflict of Interest Management Procedure
- Integrity Roles and Decision Rights Chart
- Board Integrity Indicator Set



## Day 4: Reporting Channels, Investigation Referral and Consequences

How do concerns reach the right people and lead to fair, visible outcomes?

- Speak-Up Channel Design
- Reporter Protection Safeguards
- Investigation Referral Protocol
- Disciplinary Consequence Matrix
- Lessons Learned Review Cycle

## Day 5: Applying Anti-Corruption Programme Design in One Organisation

Is the blueprint ready for a board or ministerial sponsor to adopt?

- Applying the Session 2 Risk Assessment to the Chosen Organisation
- Testing the Session 3 Due Diligence Tiers on Live Cases
- Checking the Session 4 Referral Protocol Against a Scenario
- Setting Priorities and Owners for Programme Actions
- Completing the Anti-Corruption Programme Blueprint

## Methodology

The programme relies on structured exercises built on anonymised cases from banking, energy, infrastructure and public administration. Participants work in small teams as integrity lead, board member and external reviewer, and take one organisation from risk assessment to a tested blueprint.

- Suggested activity: Rating a set of intermediary profiles by corruption risk and defending each rating.
- Suggested activity: Redrafting a gifts and hospitality rule so that staff can apply it without advice.
- Suggested activity: Walking a speak-up report through referral and deciding the consequence.

## Capstone Output

Each participant completes an anti-corruption programme blueprint for one organisation. It holds an exposure map, a control set for third parties, gifts and conflicts of interest, a reporting and referral route, a consequence matrix and a short set of board indicators. The blueprint is used to brief a sponsor and to guide the first year of delivery.

## Frequently Asked Questions

### Is anti-corruption programme design suitable for leaders who are not compliance specialists?

Yes. Anti-corruption programme design is set at strategic level and assumes you direct or oversee integrity work, not that you run investigations or draft policies yourself.



## **Which standards does anti-corruption programme design rest on in this training?**

Anti-corruption programme design rests on the United Nations Convention against Corruption, the OECD Anti-Bribery Convention and ISO 37001 for anti-bribery management systems.

## **How is the blueprint from anti-corruption programme design used at work?**

You use the anti-corruption programme blueprint to brief a board or sponsor, set owners and priorities, and guide the first stage of delivery and monitoring.

## **How does anti-corruption programme design differ from a course on fraud investigation?**

Anti-corruption programme design centres on prevention, controls and oversight across an organisation, while fraud investigation centres on examining a specific suspected case.