



## Collinson Hall

Collinson Hall is a privately-owned estate agency based in St. Albans, Hertfordshire with 24 employees. It provides sales, letting, property management and valuation services to the public and business community in both residential and commercial markets. It has a head office with 20 employees and a branch office with 4 employees, both located in St. Albans. It's business activities are limited to the St. Albans area.

Managing Director Steve Walker says "We fully intend to continue with our blend of experience, knowledge, dedication and innovation. We are here to help people with property and we believe we have the strongest team with the widest experience to help our clients.

We aspire to be the best in everything that we do - without cutting corners. Quality and integrity come as standard - with assets of such high value you should be able to take it for granted."



**Steve Walker**  
Managing Director of Collinson Hall



### Reason for interest in BS 10500

- Collinson Hall operates in the real estate sector. While the company operates to the highest of ethical standards, there are numerous bribery risks which exist due to the nature of the sector, and the public often perceives that unethical practices occur in the sector.
- While the company already had in place management, financial and commercial controls which would help prevent bribery, it had not formally implemented an anti-bribery compliance programme.
- Collinson Hall therefore wished to use BS 10500 to help it implement an anti-bribery management system, which can both help to prevent bribery occurring in relation to the company's business and be used as a positive marketing tool to promote the company as a highly ethical practice.

### Assessment of Collinson Hall's anti-corruption programme against BS 10500

Collinson Hall's Managing Director discussed each BS 10500 requirement with a BSI appointed consultant, and compared the company's policies with the BS 10500 requirements. The assessment identified which elements of BS 10500 Collinson Hall already had in place, and the elements which would need to be implemented.

The company is a small business, with 24 employees. The Managing Director, who is also the owner, exercises effective day to day control. The determination of the Managing Director that the company should behave ethically and avoid any corrupt transactions, his active day to day control over the business, and his frequent personal communication of the company's ethics to the staff, provide the primary level of anti-bribery control.

In addition to these personal controls, transactions are controlled through routine good management practices. Appropriate backing documentation will always be attached to payment requests. Cash is never used for major transactions. Purchases, sales and other business transactions are suitably supported by the necessary documents and approvals. A gifts and hospitality policy is in place.

The Managing Director checks the background of new employees before they are employed: the company has a small and stable workforce. They have written terms of employment, with disciplinary procedures. The company operates an office rather than a personal commission system, on top of a sizeable basic salary: the commission forms the minor part of employees' overall remuneration, and is therefore unlikely to act as a corruption incentive. The company has in place a conflict of interest policy and whistle-blowing procedures.

The assessment found that improvements would need to be made to Collinson Hall's policies and procedures so as to be compliant with BS 10500. In particular, many of the policies and procedures which the company was already in practice operating would need to be formalized and documented so as to become part of the official management process. Collinson Hall willingly agreed to implement these additional procedures, and determined to commence implementation immediately.

A written anti-bribery policy will be developed and be communicated to all employees. All employees will sign receipt of the policy, and will receive in-person training in relation to the corruption risks faced in their day to day activities, and the company's policies and procedures to prevent these risks.

### Further measures to be established include:

- A formal process to undertake due diligence on business partners and higher risk clients
- A gifts and hospitality register
- The company will document all aspects of the anti-bribery management system

"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



An appropriate senior manager will become compliance manager, responsible for ensuring that the company effectively develops and implements the policy and supporting procedures.

The Managing Director and appropriate senior managers will also undertake a bribery risk assessment, by considering the company's different types of business activities, clients and other parties, and assessing where the bribery risks lie in each respect. Having identified these potential risks, they can then assess the likelihood of that risk occurring, and how effective their procedures would be in identifying and avoiding the risk. Any weaknesses in the procedures would be identified as part of the process, and any improvements instituted.

### Learning

From the assessment, Collinson Hall learnt that, while it already had in place controls which would help prevent bribery, it would need to implement a formal anti-bribery management system in accordance with BS 10500, so as to provide an optimal level of control and assurance.

The additional policies and procedures which it needed to implement were clear from BS 10500, and the company commenced immediate implementation.

### Benefits of the standard

Collinson Hall believes that BS 10500 is an appropriate tool to help it enhance its anti-bribery programme. It is clearly written and understandable, scalable to the size of

the company, and also to the risks faced by it: BS 10500 processes only need to be implemented to the extent reasonable and proportionate to a company's business size and bribery risks.

The company supports the enhancement of its procedures, and the more formal approach to systems and documentation required by BS 10500, as it thinks that it results in a stronger and safer business model, which is less prone to management error or oversight.

All of the enhancements to its processes which Collinson Hall will need to implement so as to be compliant with BS 10500 will be relatively easy for it to implement. They will require some up-front work to prepare the necessary documents and procedures and to educate the employees. However, once prepared and implemented, it is likely that relevant BS 10500 requirements can be reasonably easily met as part of the company's day-to-day business process without undue burden on its resources.

Ultimately, Collinson Hall wishes its compliance with BS 10500 to be certified by a reputable independent certifying agency. It sees a positive marketing and business advantage in having such certification. However, this would depend on the certifying agent charging a reasonable sum. If the cost of certification was too high, the company will implement an ABMS which is compliant with BS 10500, and will market itself as being compliant, but may not get independently certified.

Complying with BS 10500 will take up additional management time, which is always very limited, particularly in a small business. Therefore, Collinson Hall believes that it would be beneficial if there were additional incentives for businesses to implement BS 10500 over and above the control and reputational advantages. For example:

- A professional indemnity insurer could provide a discount off premium for a business which is certified to BS 10500 (to reflect lower risk);
- Organisations could require their consultants, agents and suppliers to be accredited to BS 10500 (which would level the playing field by requiring all competitors to be certified);
- Continuing professional development (CPD) points could be awarded by professional institutions to managers who are responsible for internal compliance programmes (to reflect the knowledge enhancement they have to undertake to implement such a programme).

Collinson Hall believes that BS 10500 could be usefully supplemented by pro forma documentation which businesses could use as a template (eg code of conduct, contractual anti-bribery clauses, whistle-blowing policies, gifts and hospitality policies etc). As there are differences between business sectors, business associations could publish such documentation for their sector.



## About BS 10500: 2011 Specification for an Anti-bribery Management System

In November 2011, BSI Standards published BS 10500: Specification for an Anti-bribery Management System.

BS 10500 is intended to help an organisation to implement an effective anti-bribery management system. It can be used both in the UK and internationally. The requirements of UK law and internationally recognised good practice are taken into account. It is applicable to small, medium and large organisations in the public, private and voluntary sectors.

In order to comply with BS 10500, an organisation must implement a series of management measures, including the adoption and communication of an anti-bribery policy, training and guidance for employees, appointing a compliance manager, undertaking risk assessment and due diligence, controlling gifts and hospitality, implementing effective procurement, commercial and financial controls, and instituting reporting and investigation procedures.

Compliance with BS 10500 cannot provide assurance that no bribery has occurred or will take place in relation to an organization. However, the standard can help establish that the organization has implemented reasonable and proportionate measures designed to prevent bribery.

Well-managed ethical organisations are likely to implement anti-bribery management systems in their organisations in the same way that they would implement quality, environmental and safety management systems.

Organisations can use BS 10500 to measure and self-declare their compliance with anti-bribery best practice. In addition, they may obtain independent certification of their compliance with the standard, just as they do for ISO 9001, ISO 14001, and OHSAS 18001.

The cost of implementing an anti-bribery management system which is compliant with BS 10500 is likely to be minimal when compared to the loss and damage which could be suffered by an organisation which gets involved in corruption.

To obtain a copy of BS 10500, please visit:

<http://shop.bsigroup.com/BS10500>

## About BSI Standards

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- BS 25999-1 for business continuity management
- BS ISO/IEC 27001 for information security management
- BS EN ISO 9001 for quality management
- BS EN ISO 14001 for environmental management
- BS OHSAS 18001 for occupational health and safety management.

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- The development and sale of private, national and international standards and supporting information
- Second and third-party management systems assessment and certification
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- Performance management software solutions
- Training services in support of standards implementation and business best practice.

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