

Gateway - The BBC Intranet

Gateway

You are in: [Fraud Management](#) > [What is fraud?](#) > [Bribery & Corruption](#) > **Examples**

Contact: (02)26976

Examples



The BBC is a global organisation with diverse activities ranging from Newsgathering to licensing children's toys for manufacture in the Far East. This creates many potential areas of risk with respect to bribery and corruption as listed below. Staff should be vigilant and seek advice at all times.

[Report Fraud Here](#)

Useful links

Other useful links

Practical examples of potential risk areas

High risk activities

High risk territories

Using third parties or representatives

Mergers and acquisitions

If staff have any questions or concerns regarding potential bribery and corruption activity, they should contact their relevant **AFCO** (Assistant Fraud Control Officer).

High risk activities

Working in high risk activities increases the risk of the BBC becoming involved in bribery and other forms of corruption. It can also be difficult to distinguish between what is local custom and practice and what is in fact a bribe or facilitation payment. Examples include:

- Money paid to a government official to obtain license to broadcast
- A bribe to a local police officer to clear a production site prior to filming
- A potential supplier offers an overseas trip to you and your family during negotiations. Note: If you are in any doubt regarding hospitality you should consult your **local expenses guidelines**, which contain guidance on giving and receiving hospitality
- A dealer requests cash payment for distribution of channels
- A commissioner in a local broadcaster requests payment prior to agreeing programme commission
- A facilitation payment is made to obtain appropriate visas for staff travelling from the UK
- A new supplier offers you a cash payment alongside the standard discount
- Local traffic police request payment to remove no parking / traffic control outside an office or production site.
- Payments outside of published listings to customs officials to allow goods to be green-lit for import

High risk territories

Transparency International publishes an annual corruption perceptions index (CPI), which provides a country by country scoring, which is available together with other useful information on bribery and corruption on their website. Fraud and corruption occur in every country and staff should be vigilant and act in accordance with the principles set out in this framework irrespective of the country in which they are operating.

Using third parties or representatives

The use of agents and other **third party representatives** is a matter of risk and reward, especially when dealing in high risk countries. The BBC may become inadvertently linked to bribery or corruption or become closely linked to that country's government.

- Always conduct proper due diligence
- Ensure you continually monitor relationships after deals have been done

Mergers and acquisitions

Acquisitions in emerging markets lead to potential bribery and corruption risks and pitfalls for the BBC. One of the issues is successor liability, whereby the acquiring entity takes on liability for the past transgressions of the acquired entity. Many companies who become involved in such transactions fail to address these risks by not conducting appropriate bribery and corruption due diligence prior to, during, and following the transaction and putting in place sufficient controls.