

# Audit and Implementation Roadmap for the Commonwealth Anti-Corruption Benchmarks

For use by governments and public  
sector bodies



The Commonwealth



**GIACC**  
Global Infrastructure Anti-Corruption Centre



**RICS**<sup>®</sup>

Commonwealth Secretariat  
Marlborough House  
Pall Mall  
London SW1Y 5HX  
United Kingdom

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Publications Section  
Commonwealth Secretariat  
Marlborough House  
Pall Mall  
London SW1Y 5HX  
United Kingdom  
Tel: +44 (0)20 7747 6500  
Email: [publications@commonwealth.int](mailto:publications@commonwealth.int)  
Web: <https://books.thecommonwealth.org/>

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## SECTION 1: Definitions

1. The following definitions are used in this Audit and Implementation Roadmap:
  - 1.1. **BM:** The Commonwealth Anti-Corruption Benchmarks.
  - 1.2. **BM Co-ordinating Body:** The governmental or independent regulatory body that has responsibility for co-ordinating the BM audit and implementation process throughout government and the public sector.
  - 1.3. **BM Co-ordinator:** A senior manager of the BM Co-ordinating Body who is appointed to lead the BM-related responsibilities of the BM Co-ordinating Body on a day-to-day basis.
  - 1.4. **Checklist:** The Audit and Implementation Checklist(s) that support the audit and implementation process described in this Roadmap.
  - 1.5. **Compliance Manager:** The manager appointed to lead and supervise the audit and implementation process within an Implementing Organisation.
  - 1.6. **Implementing Organisation:** A government department, regulatory body or public sector organisation that is (i) auditing the Requirements applicable to it, and its Performance on those Requirements, against the BMs, and (ii) implementing appropriate Improvements.
  - 1.7. **Improvements:** Improvements necessary to ensure Requirements and Performance are compliant with the relevant BM provisions.
  - 1.8. **Performance:** Performance of functions by a government, an Implementing Organisation or their personnel.
  - 1.9. **Requirements:** Laws, regulations, policies and procedures that are applicable to a government, Implementing Organisation or their personnel.
  - 1.10. **Roadmap:** This Audit and Implementation Roadmap for governments and public sector bodies.

## **SECTION 2:**

### **Overview of Benchmarks**

2. The Commonwealth Anti-Corruption Benchmarks (BM) were published in April 2021 by the Commonwealth Secretariat in collaboration with the Global Infrastructure Anti-Corruption Centre (GIACC) and the Royal Institution of Chartered Surveyors (RICS).
3. The BMs contain good practice anti-corruption measures. They are intended primarily to help governments and public sector organisations assess their Requirements and Performance against international good practice from an anti-corruption perspective and to implement appropriate Improvements. They address corruption across key areas of the public and private sectors that are either important for combatting corruption or vulnerable to significant corruption. In relation to each key area, the BMs promote the concepts of honesty, impartiality, accountability and transparency and provide for specific anti-corruption measures.
4. The BM measures are designed to be achievable, practical and auditable. They represent a holistic and interlocking system that aims to reduce and deal with the risk of corruption in the public and private sectors.

## SECTION 3:

# Overview of the audit and implementation process

5. This Audit and Implementation Roadmap is designed to assist a government and any Implementing Organisation to audit its compliance with the 25 BMs and to implement any identified Improvements. It contains a step-by-step process by means of which existing Requirements and Performance can be measured against the relevant BM provisions and necessary Improvements can be identified and implemented.
6. **Preparatory Steps (see Section 4 below for details):** Prior to commencing the audit and implementation process, the following preparatory steps should be carried out:
  - Appointment of the BM Co-ordinating Body
  - Appointment of the BM Co-ordinator
  - Preparatory steps by the BM Co-ordinator
  - Preparatory steps by Implementing Organisations
  - Preparatory steps by each Implementing Organisation's Compliance Manager
7. **Audit and implementation process:** The audit and implementation process should commence after completion of the preparatory steps. There are four stages to this process:
  - 7.1 **Stage 1: Initial audit (see Section 5 below for details):** Where existing Requirements and Performance are assessed against the BMs.
  - 7.2 **Stage 2: Implementation of initial improvements (see Section 6 below for details):** Where Improvements to Requirements and/or Performance, as identified under 7.1 above, are implemented.
  - 7.3 **Stage 3: Ongoing audit (see Section 7 below for details):** Where the audit process under 7.1 is repeated at regular intervals, so as to ensure continuing effective compliance with the BMs.
  - 7.4 **Stage 4: Implementation of further improvements (see Section 7 below for details):** Where Improvements to Requirements and/or Performance, as identified under 7.3 above, are implemented.

8. **Checklists:** The audit and implementation processes can be facilitated, monitored and recorded using the Audit and Implementation Checklists. The following documents are provided:
  - **Sample Checklist Answers:** This document provides examples of the types of answers that may be appropriate in the Checklists to various provisions of various Benchmarks. This document can be downloaded here from the Commonwealth website.
  - **Checklists for BMs 1 to 25:** There is a separate Checklist for each of BMs 1 to 25. These Checklists can be allocated to relevant Implementing Organisations, which can then, using the Checklists, carry out the audit and implementation process. For those BMs (such as BMs 22–25) that are not relevant to particular Implementing Organisations, the BM Co-ordinating Body can carry out the audit and implementation process, using the relevant Checklists. Organisations using the Checklists should also be referred to the Sample Checklist Answers for examples of the types of answers that might be appropriate. The guidance in this Roadmap assumes that the Checklists are used as the basis of the audit and implementation process. Each Checklist can be downloaded here from the Commonwealth website.
9. The guidance in this Roadmap provides a suggested strategy for comprehensive use and implementation of the BMs. However, there are numerous different ways in which the BMs can be used.

## SECTION 4:

### Preparatory Steps

10. This Section outlines the steps that may be taken to prepare for the BM audit and implementation process.
11. **Appointment of the BM Co-ordinating Body:** A governmental or independent regulatory body is appointed with responsibility for co-ordinating and monitoring the BM audit and implementation process throughout government and the public sector ('the BM Co-ordinating Body'). This body could, for example, be the national Anti-Corruption Agency, if any, or the Ministry of Justice.
12. **Appointment of the BM Co-ordinator:** The BM Co-ordinating Body then appoints one of its senior managers to lead the co-ordination on a day-to-day basis ('the BM Co-ordinator'). The BM Co-ordinator should have sufficient seniority, knowledge, commitment and resources to be able to undertake these responsibilities effectively.
13. **Preparatory steps by the BM Co-ordinator:** The BMs are relevant to a wide range of government departments and public functions and officials. Some BMs may be relevant to one or more Implementing Organisations. Some may be relevant nationally, rather than to a particular Implementing Organisation. Consequently, in order to determine who should be carrying out the audit and implementation process, and how to allocate the Checklists appropriately, the BM Co-ordinator takes the following steps:
  - 13.1. Reads and understands:
    - 13.1.1. The BMs,
    - 13.1.2. The accompanying BM Guidance and
    - 13.1.3. The Checklists.
  - 13.2. Identifies which BMs are relevant to which Implementing Organisations. For example:
    - 13.2.1. BM 1 (Corruption offences, sanctions and remedies) would be relevant to the Ministry of Justice.
    - 13.2.2. BM 2 (Authority responsible for preventing corruption) would be relevant to the Anti-Corruption Authority (if any).
    - 13.2.3. BM 3 (Investigation, prosecution, asset recovery and policing) would be relevant to any agency(ies) that undertake or oversee investigation, prosecution, asset recovery and policing.



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- 13.2.4. BM 4 (The court system) would be relevant to the judiciary, the body responsible for operating the court system and the body responsible for overseeing the conduct of the legal profession.
- 13.2.5. BM 5 (Parliament) would be relevant to the body responsible for operating the parliamentary system, and the body responsible for overseeing the conduct of members of parliament.
- 13.2.6. BM 6 (Regulatory authorities) would be relevant to any bodies that have regulatory or oversight responsibility for activities that impact on the public (e.g. the provision of water, electricity, health and education).
- 13.2.7. BM 7 (Regulation of financial institutions and the financial system) would be relevant to any bodies that have regulatory or oversight responsibility for financial institutions and the financial system.
- 13.2.8. BM 8 (Transparency of asset ownership) would be relevant to any bodies that have regulatory or oversight responsibility for ensuring that details of the beneficial ownership of organisations, land and real estate, trusts and high-value moveable property are registered and disclosed to the public.
- 13.2.9. BM 9 (Political lobbying, financing, spending and elections) would be relevant to any bodies that have regulatory or oversight responsibility for ensuring that adequate controls are in place in relation to political lobbying, donations, financing and spending, and elections, and that details in this regard are recorded and disclosed to the public.
- 13.2.10. BM 10 (Public sector organisations) would be relevant to all public sector organisations (including those in 13.2.1 to 13.2.9 above).
- 13.2.11. BM 11 (Public officials) would be relevant to all public sector organisations (including those in 13.2.1 to 13.2.10 above) that employ their own personnel, and to those public bodies that are responsible for the employment, conduct, disciplining and training of other public officials such as members of the judiciary and members of parliament.
- 13.2.12. BMs 12–21 (which cover a range of management functions) would be relevant to the public sector organisations (including those in 13.2.1 to 13.2.10 above) that carry out the management functions dealt with in BMs 12–21.

- 13.3. With respect to each Implementing Organisation identified under 13.2 above, the BM Co-Ordinator:
  - 13.3.1. Sends to the Implementing Organisation the BMs, the BM Guidance and the Checklists that apply to it.
  - 13.3.2. Explains to it:
    - i) The purpose of the BMs,
    - ii) That the BM Guidance should be referred to for explanation of the BM provisions,
    - iii) The purpose and benefits to both the Implementing Organisation and the public of the audit and implementation process,
    - iv) The purpose of the Checklists and how to complete them,
    - v) The methodology for carrying out the three stages – namely, initial audit, implementation, and ongoing audit and implementation.
  - 13.3.3. Considers with it a suitable programme for completing each stage of the audit and implementation process.
- 13.4. For those BMs that do not apply to any specific Implementing Organisations but have a general application nationally, or that apply to a number of Implementing Organisations but need central co-ordination,<sup>1</sup> the BM Co-ordinator:
  - 13.4.1. Retains responsibility for carrying out the audit and implementation process in respect of those BMs.
  - 13.4.2. Identifies those bodies and persons appropriate to assist the BM Co-ordinator to carry out the audit and implementation process in relation to those BMs.

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<sup>1</sup> Such as:

- BM 22 (Standards and certification), which requires government to permit, promote and support the development and implementation of, and certification to, national and international standards.
- BM 23 (Professional institutions and business associations), which requires government to permit, promote and support the establishment and operation of professional institutions and business associations.
- BM 24 (Participation of society), which requires government to implement regulations that require that the public is informed about, and is freely able to participate in, report on, comment on and lawfully protest against, the actions of the government, public officials and public sector organisations.
- BM 25 (International co-operation), which requires government to implement regulations that require formal and informal co-operation between states in relation to specified anti-corruption matters.

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- 13.4.3. Considers, with those bodies and persons identified, a suitable programme for completing each stage of the audit and implementation process.

### 14. **Preparatory steps by Implementing Organisations:**

Each Implementing Organisation:

- 14.1. Makes a decision at top management level (e.g. Board of Directors or equivalent) that the Implementing Organisation will carry out the BM audit and implementation process.
- 14.2. Appoints a manager ('the Compliance Manager') to lead and supervise the BM audit and implementation process within the Implementing Organisation. The Compliance Manager should have sufficient seniority, knowledge, commitment and resources to be able to undertake these responsibilities effectively.

### 15. **Preparatory steps by the Compliance Manager:**

The Compliance Manager:

- 15.1. Reads and understands the Checklists provided by the BM Co-ordinator and the relevant BMs and BM Guidance.
- 15.2. Identifies which Checklists, or which parts of a Checklist, apply to which department within the Implementing Organisation. For example:
  - 15.2.1. BM 11 (Public officials), BM 20 (Anti-corruption training) and BM 21 (Reporting corruption) would be sent to the department(s) with responsibility for employing, training and disciplining personnel, and for encouraging and receiving reports of possible corruption from personnel or the public.
  - 15.2.2. BM 12 (Issuing permits) would be sent to any department that has a function that involves issuing permits or approvals to the public.
  - 15.2.3. BM 13 (Procurement) would be sent to any department that has a function that involves requesting offers from contractors, suppliers and consultants for works and services, for evaluating those offers and for placing contracts with respect to those offers.
  - 15.2.4. BM 14 (Contract management) would be sent to any department that has a function that involves managing and approving works and services undertaken by contractors, suppliers and consultants.
  - 15.2.5. BM 15 (Financial management) would be sent to any department that has a function that involves managing the organisation's finances, and making payments to personnel, contractors, suppliers and consultants.

- 15.2.6. BM 16 (Concession management) would be sent to any department that has a function that involves requesting offers from concession operators (e.g. to extract minerals or operate a toll road), evaluating those offers, and placing and managing contracts with respect to those offers.
- 15.2.7. BM 17 (Asset management) would be sent to any department that has a function that involves purchasing, selling or managing assets on behalf of the organisation (e.g. buildings, vehicles, equipment).
- 15.2.8. BM 18 (Independent monitoring) would be sent to any department that has a function that involves providing or liaising with persons appointed to provide independent monitoring of the organisation's functions and contracts.
- 15.2.9. BM 19 (Independent auditing) would be sent to any department that has a function that involves providing or liaising with persons appointed to provide independent auditing of the organisation's functions and contracts.
- 15.3. With respect to each department identified under 15.2 above, the Compliance Manager:
  - 15.3.1. Sends to each department the BMs, the BM Guidance and the Checklists that apply to it.
  - 15.3.2. Explains to it:
    - i) The purpose of the BMs,
    - ii) That the BM Guidance should be referred to for explanation of the BM provisions,
    - iii) The purpose and benefits to both the Implementing Organisation and the public of the audit and implementation process,
    - iv) The purpose of the Checklists and how to complete them,
    - v) The methodology for carrying out the three stages – namely, initial audit, implementation, and ongoing audit and implementation.
  - 15.3.3. Considers with it a suitable programme for completing each stage of the audit and implementation process.
- 15.4. For those Checklists that, in whole or in part, do not apply to any specific department, but have a general application throughout the Implementing Organisation, the Compliance Manager:
  - 15.4.1. Retains responsibility for carrying out the audit and implementation process for those items.

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- 15.4.2. Identifies those bodies and persons appropriate to assist the Compliance Manager to carry out the audit and implementation process for those items.
- 15.4.3. Considers, with those bodies and persons, a suitable programme for completing each stage of the audit and implementation process for those items.

## SECTION 5:

### Stage 1 - Initial Audit

16. This Section examines the possible actions that may be taken by the BM Co-ordinator and Implementing Organisations in undertaking the initial audit.
17. **The purpose of the initial audit** is to assess the current state of compliance with relevant BMs and to identify necessary Improvements that should be implemented to achieve compliance. The initial audit is divided into two parts:
  - 17.1. **Part 1: Requirement compliance (Column B of the Checklists):** This involves:
    - 17.1.1. Identifying whether existing Requirements comply with BM provisions (i.e. that the wording of the Requirements suitably meets or exceeds the relevant BM provisions, and is appropriately clear and documented).
    - 17.1.2. Where they do not, identifying Improvements to the Requirements necessary to achieve compliance.
    - 17.1.3. Providing a score to show the current degree of Requirement compliance.
  - 17.2. **Part 2: Performance compliance (Column C of the Checklists):** This involves:
    - 17.2.1. Identifying whether existing Performance complies with BM provisions (i.e. that Performance suitably meets or exceeds the relevant BM provisions).
    - 17.2.2. Where it does not, identifying the Improvements to Performance necessary to achieve compliance.
    - 17.2.3. Providing a score to show the current degree of Performance compliance.
18. **Initiating and monitoring the initial audit:** The BM Co-ordinator:
  - 18.1. Requests each Implementing Organisation to:
    - 18.1.1. Commence the initial audit,
    - 18.1.2. Complete Columns B and C of the relevant parts of the Checklist(s) and
    - 18.1.3. Return the completed checklists to the BM Co-ordinator by a specified date.

## Stage 1 - Initial Audit

- 18.2. Answers questions from the Implementing Organisations on the BMs and on how to complete the Checklists.
- 18.3. Monitors and keeps a record of the progress of the initial audit.
- 18.4. Where the initial audit is falling behind the planned progress, identifies the reasons for the delay, and liaises with the relevant Implementing Organisations to encourage progress and help overcome any obstacles to progress.
- 18.5. Reports periodically to the top management body of the BM Co-ordinating Body on the progress of the audit.

### 19. Initial audit

- 19.1. **By Implementing Organisations:** Having received the request as under paragraph 18 from the BM Co-ordinator, the Compliance Manager of each Implementing Organisation:
  - 19.1.1. Requests the relevant departments to:
    - i) Commence the initial audit,
    - ii) Complete Columns B and C of the relevant parts of the Checklists and
    - iii) Return the completed Checklists to the Compliance Manager by a specified date.
  - 19.1.2. Answers questions from the departments on the BMs and on how to complete the Checklists.
  - 19.1.3. Monitors and keeps a record of the progress of the initial audit.
  - 19.1.4. Where the initial audit process is falling behind the planned progress, identifies the reasons for the delay, and liaises with the relevant departments and personnel to encourage progress and help overcome any obstacles to progress.
  - 19.1.5. Retains responsibility for completing the whole or any parts of any Checklists that are applicable to the Implementing Organisation, but that have not been allocated to a specific department for completion, and obtains the necessary information to complete them from relevant personnel.
  - 19.1.6. Liaises with, and keeps informed, the BM Co-ordinator in relation to the audit.
  - 19.1.7. Reports periodically to the top management body of the Implementing Organisation on the progress of the audit.
  - 19.1.8. Reviews the completed Checklists and follows up with any departments that have incompletely or incorrectly completed the Checklists to ensure that the correct information is

provided, considers whether the 'scores' in Columns B and C reasonably reflect the provided information and assesses whether appropriate Improvements have been identified.

- 19.1.9. Where it is reasonable and helpful to do so, prepares a summary note that categorises and explains the findings of the initial audit and the key identified Improvements, and that makes recommendations as to implementation actions and timings.
- 19.1.10. Sends the completed Checklists and any summary note to the BM Co-ordinator within the required time limits.
- 19.2. **By the BM Co-ordinator:** In order to carry out the initial audit in respect of those BMs identified under paragraph 13.4 above (BM of general application or those that apply to a number of Implementing Organisations needing central co-ordination), the BM Co-ordinator, in consultation with government and relevant organisations and personnel, completes Columns B and C of the relevant parts of the relevant Checklists.
- 20. **Review by the BM Co-ordinator of the completed Checklists:**
  - 20.1. Having received and completed all relevant Checklists and summary notes under paragraph 19 above, the BM Co-ordinator reviews the information from all completed Checklists and summary notes and follows up with any Implementing Organisations that have incompletely or incorrectly completed the Checklists so as to ensure that the correct information is provided, that scores have been properly applied and that appropriate Improvements have been identified.
  - 20.2. Where it is reasonable and helpful to do so, the BM Co-ordinator prepares a summary note that categorises and explains the findings of the initial audit and the key identified Improvements, and that makes recommendations as to implementation actions and timings.
- 21. **Sample audit by the BM Co-ordinator:**
  - 21.1. In order to help verify that the Implementing Organisations have completed the Checklists accurately and with good intent, the BM Co-ordinator (or other independent persons under their control) verifies the accuracy of the completed Checklist information in relation to:
    - 21.1.1. A sample of Implementing Organisations and
    - 21.1.2. A sample of Checklist questions in relation to the selected Implementing Organisations.
  - 21.2. So as to ensure the reasonableness, proportionality and effectiveness of the sample audit, Implementing Organisations that are perceived to



be more likely to have failed, and Checklist questions that cover points of more significant adverse outcome, may be selected for the sample audit.

- 21.3. So as to encourage compliance with the audit and implementation exercise, Implementing Organisations are informed of the possibility of an audit, but are not informed as to which Implementing Organisations or which Checklist questions will be audited.
- 22. **Decision on Improvements to be implemented:** In order to determine which Improvements identified in the initial audit should be implemented and the timetable for their implementation:
  - 22.1. The BM Co-ordinator:
    - 22.1.1. Sends the completed Checklists and any summary notes to the top management of:
      - i) The BM Co-ordinating Body and
      - ii) The relevant Implementing Organisations.
    - 22.1.2. Requests those bodies to review the identified Improvements and make a decision, by a specified date, as to the Improvements to be implemented, and a timetable for implementation.
    - 22.1.3. Provides any additional information or recommendations that may be requested by, or be helpful to, to the BM Co-ordinating Body and Implementing Organisations.
  - 22.2. The top management of the BM Co-ordinating Body and of the relevant Implementing Organisations, based on the information submitted to them, makes appropriate decisions as to which Improvements will be adopted, how they will be implemented and in accordance with what timescale, and notifies those decisions to the BM Co-ordinator and relevant Compliance Managers.

## SECTION 6:

### Stage 2 - Implementation of initial improvements

23. This Section examines the possible actions that the BM Co-ordinator and Implementing Organisations could take in implementing the identified Improvements.
24. **Initiating and monitoring the Implementation process:** The BM Co-ordinator:
  - 24.1. Ensures that it has received decisions from top management of the relevant Implementing Organisations and the BM Co-ordinating Body with respect to all Improvements identified under the initial audit (as per paragraph 22 above).
  - 24.2. In accordance with these decisions, instructs the Implementing Organisations to commence the implementation process, and sets deadline(s) by which:
    - 24.2.1. The relevant Implementing Organisations should implement the relevant Improvements and complete Columns D and E of the Checklists and return them to the BM Co-ordinator.
    - 24.2.2. The BM Co-ordinator should implement those Improvements for the BMs identified under paragraph 13.4 above (BMs of general application or those that apply to a number of Implementing Organisations needing central co-ordination), and complete Columns D and E of the Checklists.
  - 24.3. Provides appropriate advice to any Implementing Organisation that has questions on the implementation process.
  - 24.4. Where enabling legislation or additional funding is needed to enable the implementation of the identified Improvements, liaises with the relevant legislating body, government funding body and Implementing Organisations so as to encourage and support the passing of the necessary enabling legislation and raising of the necessary additional funding.
  - 24.5. Monitors and keeps a record of the progress of the implementation process.
  - 24.6. Where the implementation process is falling behind the planned progress, identifies the reasons for the delay and liaises with the

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relevant organisations to encourage progress and help overcome any obstacles to progress.

- 24.7. Reports periodically to the top management body of the BM Co-ordinating Body on the progress of implementation.

### 25. Implementation of Improvements:

#### 25.1. **By the Implementing Organisation:** The Compliance Manager:

- 25.1.1. Reads and understands the nature, scope and timing of the identified Improvements.
- 25.1.2. Identifies which Improvements apply to which department within the Implementing Organisation, and requests the relevant departments to implement the Improvements and complete Columns D and E of the relevant Checklists before the specified deadline.
- 25.1.3. Provides appropriate advice to any department that has questions on the implementation process.
- 25.1.4. Where there is no department responsible for implementing a specific Improvement, retains responsibility for implementing that Improvement, and takes all necessary steps to ensure that it is implemented.
- 25.1.5. Liaises with, and keeps informed, the BM Co-ordinator in relation to the implementation process.
- 25.1.6. Reports periodically to the top management body of the Implementing Organisation on the progress of implementation.
- 25.1.7. Monitors and keeps a record of the progress of the implementation process.
- 25.1.8. Where the implementation process is falling behind the planned progress, identifies the reasons for the delay, and liaises with the relevant departments and personnel to encourage progress and help overcome any obstacles to progress.
- 25.1.9. Reviews:
  - i) The Improvements implemented by the various departments to ensure they have been properly implemented.
  - ii) The completed Checklists to ensure they are accurately completed and scores are properly applied.
- 25.1.10. Returns the completed Checklists to the BM Co-ordinator by the specified deadline.

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- 25.2. **By the BM Co-ordinator:** The BM Co-ordinator implements those Improvements for the BMs identified under paragraph 13.4 above (BMs of general application or those that apply to a number of Implementing Organisations needing central co-ordination) and completes Columns D and E of the Checklists by the specified deadline.
26. **Review by the BM Co-ordinator of the completed Checklists:** Having received all relevant checklists under paragraph 25 above, the BM Co-ordinator reviews the information from all completed Checklists and follows up with any Implementing Organisations that have incompletely or incorrectly completed the Checklists so as to ensure that the correct information is provided and that scores have been properly applied.
27. **Sample audit by the BM Co-ordinator:** In order to help verify that the Implementing Organisations have implemented the identified Improvements properly and with good intent, the BM Co-ordinator (or other independent persons under its control) personally verifies the implementation of the identified Improvements on a similar sample basis as under paragraph 21 above.

## **SECTION 7:**

### **Stages 3 and 4 - Ongoing audit and implementation of further improvements**

28. Once the initial audit has been undertaken (Section 5 above), and the necessary Improvements implemented (Section 6 above), ongoing audit and implementation should be carried out periodically and on a regular basis so as to:
  - 28.1. Assess continuing compliance with the BMs and with previously identified Improvements.
  - 28.2. Identify and implement any further necessary Improvements.
29. The BM Co-ordinator should have overall responsibility for co-ordinating and monitoring the ongoing audit and implementation process.
30. The ongoing audit and implementation process should follow the same process as the initial audit and implementation processes. Columns F, G, H and I of the Checklists should be completed.
31. The ongoing audit and implementation processes are likely to be simpler, cheaper and quicker to undertake than the initial audit and implementation processes, as people will be familiar with the BM provisions, the Checklists, and the audit and implementation processes, and the Requirements and Performance should have been previously improved so as to be compliant.
32. The ongoing audit and implementation processes may be split into components that are spread over several years so as to simplify the ongoing audits and reduce the cost of undertaking them. For example, a three-year audit programme may be agreed under which one-third of all Requirements, or one-third of all Implementing Organisations, are audited each year.