

Board of Management Development Committee

Date of Meeting	Wednesday 29 January 2020
Paper No.	DC2-B
Agenda Item	3.2
Subject of Paper	Anti-Bribery and Corruption Policy
FOISA Status	Disclosable
Primary Contact	Stuart Thompson, VP Corporate Services
Date of production	January 2020
Action	For Approval

1. Recommendations

The Committee is asked to review the Anti-Bribery and Corruption Policy for approval, subject to any agreed changes.



Anti-Bribery and Corruption Policy

© 2020 City of Glasgow College

Charity Number: SC036198

Table of Contents

1. Introduction	3
2. Purpose and Aims	3
3. Scope	4
4. Policy Statement.....	4
5. Definitions.....	11
6. Responsibilities.....	14
7. References	15
7.1.Policy Framework	15
7.2.Other College Policies and Procedures	15
7.3.External References	15
8. Document Control and Review.....	16
9. Revision Log.....	16
Appendix 1 Corruption Perceptions Index 2018	17

Anti-Bribery and Corruption Policy

1. Introduction

The City of Glasgow College recognises the importance and legal requirement to manage potential bribery and corruption. The principal applicable law regarding bribery and corruption is UK criminal law and in particular the Bribery Act 2010, which has extra-territorial reach and is applicable to the College's activities irrespective of geographic location.

2. Purpose and Aims

The City of Glasgow College values its reputation for ethical behaviour and for financial probity and reliability. The College recognises that any involvement in bribery will reflect adversely on its image and reputation. The College will, therefore, prohibit the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement to or from any person, company or other organisation. The College shall prevent bribery and corruption by:

Taking a zero tolerance approach towards bribery and/or corruption.

Communicating this policy to all employees and agents working on behalf of the College.

Training employees so that they can recognise and avoid the use of bribery.

Encouraging its employees to be vigilant and to report any suspicion of bribery.

Rigorously investigating instances of alleged bribery.

Taking firm and vigorous action against any individual(s) involved in bribery.

3. Scope

This Policy applies to:

- 3.1. All members of staff and members of the College Board of Management;
- 3.2. All geographical locations and all College functions/services; and
- 3.3. All third parties, including subsidiaries, agency workers, consultants, suppliers, contractors and overseas agents.

4. Policy Statement

4.1. Bribery & Corruption

4.1.1. Bribery occurs when “Anything of Value”¹ is received or offered to be paid to an employee as an inducement or reward for the improper performance of a duty or obligation. This form of bribery also occurs when a party offers gifts, entertainment or hospitality that will breach the College’s gifts and entertainment regulations. “Passive Bribery” occurs when “Anything of Value” is requested by an employee for the improper performance of his/her duties or responsibilities.

4.1.2. Corruption is the misuse of entrusted power or public office for private gain and is a serious criminal offence. The principle applicable law regarding bribery and corruption is the criminal law in the UK and particularly the Bribery Act 2010.

4.2. Third Parties

4.2.1. This Policy also applies to the engagement of Third Party intermediaries. The College expects all Third Parties, including business partners, service providers and contractors, to act with integrity and to undertake their business without bribery or corruption. In addition to the above, the College will investigate reported allegations of bribery, corruption and abuse of position for personal gain, involving, or in any way connected to the College. If necessary, action will be taken as a result of such investigations, including termination of relationships with

¹ See attached glossary

Third Parties and reports to relevant governmental authorities or regulators.

4.2.2. The definition of third parties is broad, and could include agents, business partners, service providers, contractors or any individual who is nominated to act on behalf of the organisation. Whilst the use of agents and business partners can help us reach our goals, we need to be aware that these arrangements can potentially present the College with significant risks.

4.2.3. Risks can be identified where a business partner conducts activities on behalf of the College, so that the result of their actions can be seen as benefiting the College. Business partners who act on behalf of the College must be advised of the existence of and operate at all times in accordance with this policy. Local Management is responsible for the evaluation of each relationship and determining whether or not it falls into this category. Furthermore, a risk assessment exercise should be carried out to determine whether the third party intermediary is a high, medium or low risk to the College. Due diligence checks must be carried out when appointing and retaining third parties and such checks include but are not limited to:

- An assessment of the rationale for engaging the third party intermediary;
- An evaluation of the third party's ability to deliver the service;
- An evaluation of the integrity of the third party, including background checks on publicly available records on individuals/companies;
- Financial and credit checks; and
- Standard terms and conditions which specify the scope of the work and inform the third party of the College's Anti-Bribery & Corruption policy and includes the right to audit, right to exit in the event of a suspicion and/or breach occurring.
- A review of the global Corruption Perceptions Index (Appendix 1) and an assessment for all countries will be conducted prior to any engagement.

4.3. Facilitation Payments

4.3.1. The College will not tolerate or condone the use of facilitation payments by its employees or any person acting on behalf of the College. This requirement covers any Public Official from any country worldwide.

4.4. Political Donations

4.4.1. The College will not make any political donations to candidates for public office, individual politicians, political parties and other political organisations. Members of staff are, therefore, not authorised to make any political donations on behalf of the College.

4.5. Charitable Gifts & Sponsorship

4.5.1. The College is committed to investing in the communities it serves. It is important that charitable donations by the College are free from any suspicion of corruption and bribery, whether direct or indirect. Given the College's own status as a charity, it will only be in exceptional circumstances that it will make charitable donations. The exceptions shall include donations to the City of Glasgow College Foundation and the Scottish Colleges Foundation.

4.5.2. A member of the Executive Leadership Team will authorise all such donations in line with the Financial Regulations and ensure that the donations are not made as an inducement for the purpose of obtaining any improper advantage or favour or for influencing a Public Official. Approved donations will be subject to an appropriate due diligence exercise.

4.5.3. The Vice Principal Corporate Services will ensure the College's finance system separately identifies and records approved charitable donations.

4.5.4 These requirements apply where the estimated value is in excess of £50 for a one-off instance. Repeated instances of transactions less than £50 from the same source which in total are over £100 must be recorded. Failure to record transactions might result in disciplinary action. Any queries about the contents of the register should be directed to the College Secretary.

4.6. Gifts and Hospitality

4.6.1. Board members and members of staff must not accept or offer any gift, reward or hospitality from any individual, company or organisation with whom they have contact in the course of their College work as an inducement either for doing something or not doing something in their official capacity.

4.7. Accepting Gifts & Hospitality or Entertainment

Board members and members of staff **must**:

- Not create suspicion of any conflict between their official duty and their private interest;
- Not give the impression (to any member of the public, to any organisation with whom they deal or to their colleagues) that they have been (or may have been) influenced by a benefit to show favour or disfavour to any person or organisation;
- Not accept inducements which could lead to a contractual position between the College and a supplier, contractor or consultant;
- Not accept substantial offers of entertainment, invitations to social functions, travel or accommodation;
- Not normally accept tickets/invitations to sporting, cultural or social events, particularly from the same source. Given the nature of the College's business it may be necessary to accept invitations to such events. These should be approved in advance by the Board Chairperson for Board members or Principal and a member of the College's Executive Leadership Team for members of staff;
- Not accept excessive hospitality offered in substitution for fees for broadcasts, speeches, lectures or other work done; and
- Take care when offered any form of hospitality or gift from a person or organisation, which has, or is hoping to have, a contractual relationship with the College. If a Board member has any doubt, then he/she should consult with the College Secretary. If a member of staff has any doubt about whether to accept hospitality offered they should refer the matter to their line manager/supervisor, who in turn may discuss it with their senior manager.

4.7.1. The College accepts that members of staff or Board members may sometimes receive conventional gifts or hospitality.

- Members of staff must, however, obtain the approval of their senior manager to accept the gift and record any gifts, hospitality or entertainment accepted in the College's register of gifts.
- Board members must record any gifts, hospitality or entertainment accepted in the College's register of gifts

These requirements apply where the estimated value is in excess of £50 for a one-off instance. Repeated instances of transactions less than £50 from the same source which in total are over £100 must be recorded. Failure to record transactions might result in disciplinary action. Any queries about the contents of the register should be directed to the College Secretary.

4.7.2. If, exceptionally, a member of the Executive Leadership Team agrees that there are circumstances that justify the normal level of hospitality being exceeded, this must be recorded in the register of gifts held by the College Secretary.

4.8. Giving Gifts & Hospitality or Entertainment

4.8.1. The giving of reasonable hospitality, often in the form of food or drink to be consumed at an event or a business meeting, and the giving of promotional items, usually bearing the College's logo, are acceptable and should not give rise to any difficulty if kept within reasonable bounds

Board members and members of staff are:

- Prohibited from giving cash to Public Officials, clients or any third party (such as a supplier);
- Prohibited from giving cash gifts to more senior employees or Board members (this does not apply to gifts of cash where such gifts are made as part of normal office practice, e.g. as collections for wedding or leaving gifts); and
- Prohibited from offering gifts, entertainment or hospitality that they know or suspect will breach the gifts and entertainment policy of the relevant third party.

4.8.2. The College's register of gifts and hospitality should contain details of all gifts/entertainment offered and their monetary value as well as details of the approval routes for these. These requirements apply where the estimated value is in excess of £50 for a one-off instance. Repeated instances of transactions less than £50 to the same person/organisation must be recorded. Failure to record transactions might result in disciplinary action. Any queries about the contents of the register should be directed to the College Secretary.

4.9. Registration & Declaration of Interests

4.9.1. Open cultures are less conducive to bribery, corruption, fraud and irregularity than secretive ones. For this reason, the Second Report of the Committee on Standards in Public Life stressed the need for Board Members to declare and register their interests. The College Secretary will, therefore, maintain the Board's register of interest, which will be updated annually and published in the College's website.

4.9.2. There is also a need for senior managers to declare and register their interests where appropriate. Staff at many levels will have an opportunity to influence the choice of suppliers and contractors. Members of staff must, therefore, ensure that the selection of suppliers and contractors always reflects the best interests of the College, and not the personal or family interest of any member of the College. The HR Director will, therefore, ensure a register of interest records the relevant information about the College's senior managers and other resource managers. The register entry for each member of staff will be updated annually and checked by the relevant line manager plus a member of the Executive Leadership Team.

4.10. Anti Money Laundering

4.10.1. The Proceeds of Crime Act 2002 (as amended), the Terrorism Act 2002 (as amended) and the Money Laundering Regulations 2007 (as amended), impose obligations on the College in respect of money laundering and associated activities. The definition of money laundering

activities under the above legislation is wide and all companies and institutions, including the College, are subject to the legislation. Non-compliance with this legislation carries financial penalties and reputational consequences for both the College and its employees (including possible individual staff criminal prosecution that could result in up to 14 years imprisonment or a large fine).

4.10.2. Any member of staff could be potentially committing an offence if he or she suspects money laundering, becomes involved in some way, or does nothing about it. Disciplinary action under the College's procedures may be taken against any member of staff who fails to comply with College guidelines.

4.10.3. The purpose of these guidelines is to ensure that the College and its staff comply with the legislation, and are aware of their respective obligations. The relevant procedures must be followed if an employee suspects that someone may be attempting to launder money.

4.10.4. It is particularly important that employees who are responsible for dealing with the receipt or outlay of funds, whether in the form of cash, cheque or bank transfer are familiar with these guidelines and that they act without delay if they suspect that money laundering is taking place.

4.11. Training and Awareness

4.11.1. The College Secretary will ensure that this Policy is communicated to all Board members and employees at least once per year.

4.11.2. The HR Director will ensure that appropriate and regular training is established, updated and implemented for members of staff. Consideration of the appropriate level of training should also be given to those members of staff who are to be involved in higher-risk activities, either specifically or as part of other training and such higher-risk training will usually include case studies and practical small group seminars.

4.12. Consequences of Non-compliance

4.12.1. The penalties for contravention of the laws can include under the UK Bribery Act 2010 unlimited corporate fines, and for individuals unlimited fines plus up to ten years imprisonment. Penalties from more than one jurisdiction may also apply in a single case of bribery or corruption.

4.12.2. Failure to comply with this Policy may lead to:

- Criminal, civil or regulatory liabilities or penalties including fines and imprisonment;
- Serious reputational damage; and
- The unenforceability of contracts entered into by College.

4.12.3. Failure to comply with this Policy may lead to members of staff:

- Being held personally liable, such as fines or imprisonment potentially under the laws of more than one jurisdiction;
- Being subject to disciplinary action, up to and including dismissal; and
- Being subject to other sanctions imposed by regulators, including a ban from working in the financial services industry.

4.12.4. Any allegations of bribery made will be investigated in accordance with the College's Disciplinary Policy and Procedure. Such action may be considered not only against those found to have perpetrated bribery, but also against those whose negligence may have facilitated it.

4.12.5. The Chairperson of the Audit Committee will be kept informed of any bribery investigations and the resultant outcome. The Principal and the Audit Committee Chairperson will be notified prior to any Police involvement.

5. Definitions

BRIBERY AND CORRUPTION GLOSSARY

The following definitions are intended to assist understanding of this Policy and are not intended to restrict or limit the application of the Policy.

- 5.1. **"Anything of Value"** means any advantage, financial or otherwise, and includes, but is not limited to money, loan, fee, stock, contractual right of interest, real estate, personal property, or other interests arising from business relationships, gifts, meals, entertainment, contributions or donations, including those made at the suggestion or direction of a Public Official, travel and travel related expenses, offers of employment or internships, below-market discounts, refunds, rebates, preferential treatment in the provision of, or preferential access to business opportunities, goods or services that does not have a commercially reasonable justification, or has other improper inducements.
- 5.2. **"Bribe" or "Bribery"** is the offer, promise, payment, transfer request for or receipt of Anything of Value, including a financial or other advantage, whether directly or indirectly, to or from any person, for that person (or any other person) to improperly perform any official or other duties, or breach any contractual or other obligations, . A Bribe can take the form of a "reward" and be paid after the improper performance of the relevant duty or obligation has taken place. Bribery also occurs when a party offers Anything of Value e.g. gifts, entertainment or hospitality that they know or believe will breach the gifts and entertainment policy of the prospective third party recipient or otherwise constitute the improper performance of a relevant function or activity of the third party.
- 5.3. **"Cash"** means any payment, or quasi-cash instrument, e.g. store vouchers, cheque made to cash or bearer, loans, gold or other precious metals or other easily liquidated asset, etc.
- 5.4. **"Corruption"** is the misuse of entrusted power or public office for private gain. This involves, on the one hand, offering or promising Anything of Value, including a financial or other advantage, whether directly or indirectly, to a Public Official to influence a Public Official. On the other hand, Corruption involves the demanding or accepting of Anything of Value, including a financial or other advantage, by a Public Official or private sector individual, as a condition to conferring business, obtaining a preferential position or other improper advantage whether directly or indirectly. Corruption is often associated with organised crime, money

laundering and sometimes the financing of terrorism. Corruption may include 'kick-backs', i.e. payment of a proportion of a contract payment to an employee or representative of another contracting party.

5.5. **“Facilitation payment”** is a payment made to a public official to facilitate or expedite approval of some type of routine business transaction or activity.

5.6. **“Public Official”** means:

- any officer or employee of, or other person acting in an official capacity for a government, whether national, federal or local;
- any individual or group exercising a legislative, administrative or judicial function, whether appointed or elected, including officials exercising a public function on behalf of any entity controlled or owned by a government, including but not limited to central banks, sovereign wealth funds, state-run hospitals, any public international organisation and any business venture that is owned or controlled by a government entity;
- any candidate for or holder of public office;
- any official of a political party;
- any official or agent of a public international organization;
- any member of a royal family; and
- the relevant Public Official's close family members (e.g. spouse, children, parents, and siblings) and close associates (e.g. key business colleagues, personal advisers and legal entities owned or controlled by that person).

5.7. **“Third Party”** means any agent, representative, consultant, or other intermediary, associated with the College by providing it services or acting for or on behalf of the College, and includes (but is not limited to) consultants, finders, introducers, lobbyists (of any kind), tax advisers, lawyers, sales and marketing firms, outsourcers, charities, members of joint ventures in which the College has a minority stakeholding of less than 50% (excluding passive investments) and any organisation or partnership that the College may wish to acquire a stake in, whether as a controlling stakeholder or as a minority stakeholder (excluding passive investments).

5.8. **“Whistleblowing”** means in the context of the Public Interest Disclosure Act is the disclosure by an employee (or other party) about malpractice in

the workplace. A whistleblower can blow the whistle about crime, civil offences (including negligence, breach of contract, etc), miscarriage of justice, danger to health and safety or the environment and the cover-up of any of these. It does not matter whether or not the information is confidential and Whistleblowing can extend to malpractice occurring in the UK and any other country or territory.

6. Responsibilities

Members of staff and Board members are:

- 6.1. Required to familiarise themselves with the College's anti-bribery policy;
- 6.2. Prohibited from offering, promising, or paying a bribe of any kind;
- 6.3. Prohibited from offering gifts, entertainment or hospitality that they know or believe will breach the gifts and hospitality policy of the relevant third party recipient;
- 6.4. Prohibited from accepting or soliciting a bribe of any kind (and must report any such offers);
- 6.5. Prohibited from accepting "Anything of Value" from a Public Official;
- 6.6. Prohibited from giving, offering, or transferring "Anything of Value" to a Public Official or to another person at the request or with the consent of a Public Official in order to influence a Public Official; and

Required to report any suspicion of corruption or bribery to a member of the College's Executive Leadership Team or the Chairperson of the Audit Committee. Alternatively the member of staff can follow the procedures set in the College's Whistleblowing Policy.

The Audit Committee of the Board will consider the suitability and effectiveness of this Policy. In addition, the Executive Leadership Team will establish adequate procedures to monitor the implementation and compliance with this Policy.

7. References

7.1. Policy Framework

Associated Policies and Procedures	Title

7.2. Other College Policies and Procedures

Policy / Procedure	Title
Code of Conduct;	Code of Conduct Policy
Financial Regulations;	Financial Regulations;
Fraud Policy;	Fraud Policy;
Whistleblowing Policy.	Whistleblowing Policy.

7.3. External References

Source	Title
Scottish Government	Scottish Public Finance Manual and Terrorism Act 2000

8. Document Control and Review

Approval Status	Approved
Approved by	Audit Committee
Date Approved	February 2020
EQIA Status	Initial Screening Conducted? Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/> Full EQIA Conducted? Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Proposed Review Date	June 2021
Lead Department	Finance
Lead Officer(s)	Vice Principal Corporate Services
Board Committee	Audit Committee
Copyright © 2020 City of Glasgow College	Permission granted to reproduce for personal use only. Commercial copying, hiring lending, posting online is strictly prohibited

9. Revision Log

Version Date	Section of Document	Description of Revision
V1		Initial post-merger policy
V2		Overall review and update to reflect new structure
V3		Overall review and update to reflect new structure
V4	4.10	Anti-money laundering section added
V5		Overall review and update to reflect new structure
V6	4.2.3 Appendix 1	Added global Corruption Perceptions Index for individual countries

Appendix 1

Corruption Perceptions Index 2018

The index ranks countries according to the perceived levels of corruption in their public sectors, based on the views of experts and business people. It runs on a scale of zero to 100, with zero being highly corrupt and 100 very clean. More than two-thirds of countries score below 50 points and the average score overall is just 43. The worst-ranking country, Somalia, has just 10 points.

Corruption Perceptions Index 2018: Score and rank changes 2017-2018

Country	ISO3	Region	CPI Score 2018	CPI Score 2017	Change in scores 2017-2018	CPI Rank 2018	CPI Rank 2017
Somalia	SOM	SSA	10	9	↑ 1	180	180
South Sudan	SSD	SSA	13	12	↑ 1	178	179
Syria	SYR	MENA	13	14	↓ -1	178	178
Yemen	YEM	MENA	14	16	↓ -2	176	175
Korea, North	PRK	AP	14	17	↓ -3	176	171
Afghanistan	AFG	AP	16	15	↑ 1	172	177
Sudan	SDN	SSA	16	16	→ 0	172	175
Equatorial Guinea	GNQ	SSA	16	17	↓ -1	172	171
Guinea Bissau	GNB	SSA	16	17	↓ -1	172	171
Libya	LBY	MENA	17	17	→ 0	170	171
Burundi	BDI	SSA	17	22	↓ -5	170	157
Iraq	IRQ	MENA	18	18	→ 0	168	169
Venezuela	VEN	AME	18	18	→ 0	168	169
Angola	AGO	SSA	19	19	→ 0	165	167
Chad	TCD	SSA	19	20	↓ -1	165	165
Congo	COG	SSA	19	21	↓ -2	165	161
Turkmenistan	TKM	ECA	20	19	↑ 1	161	167
Cambodia	KHM	AP	20	21	↓ -1	161	161
Democratic Republic of the Co	COD	SSA	20	21	↓ -1	161	161
Haiti	HTI	AME	20	22	↓ -2	161	157
Zimbabwe	ZWE	SSA	22	22	→ 0	160	157
Uzbekistan	UZB	ECA	23	22	↑ 1	158	157
Mozambique	MOZ	SSA	23	25	↓ -2	158	153
Eritrea	ERI	SSA	24	20	↑ 4	157	165
Tajikistan	TJK	ECA	25	21	↑ 4	152	161
Madagascar	MDG	SSA	25	24	↑ 1	152	155
Cameroon	CMR	SSA	25	25	→ 0	152	153
Nicaragua	NIC	AME	25	26	↓ -1	152	151
Azerbaijan	AZE	ECA	25	31	↓ -6	152	122
Central African Republic	CAF	SSA	26	23	↑ 3	149	156
Uganda	UGA	SSA	26	26	→ 0	149	151
Bangladesh	BGD	AP	26	28	↓ -2	149	143
Comoros	COM	SSA	27	27	→ 0	144	148
Nigeria	NGA	SSA	27	27	→ 0	144	148
Guatemala	GTM	AME	27	28	↓ -1	144	143
Kenya	KEN	SSA	27	28	↓ -1	144	143
Mauritania	MRT	SSA	27	28	↓ -1	144	143
Guinea	GIN	SSA	28	27	↑ 1	138	148
Lebanon	LBN	MENA	28	28	→ 0	138	143
Mexico	MEX	AME	28	29	↓ -1	138	135

Corruption Perceptions Index 2018: Score and rank changes 2017-2018

Country	ISO3	Region	CPI Score 2018	CPI Score 2017	Change in scores 2017-2018	CPI Rank 2018	CPI Rank 2017
Papua New Guinea	PNG	AP	28	29	↓ -1	138	135
Russia	RUS	ECA	28	29	↓ -1	138	135
Iran	IRN	MENA	28	30	↓ -2	138	130
Honduras	HND	AME	29	29	→ 0	132	135
Kyrgyzstan	KGZ	ECA	29	29	→ 0	132	135
Laos	LAO	AP	29	29	→ 0	132	135
Paraguay	PRY	AME	29	29	→ 0	132	135
Myanmar	MMR	AP	29	30	↓ -1	132	130
Bolivia	BOL	AME	29	33	↓ -4	132	112
Dominican Republic	DOM	AME	30	29	↑ 1	129	135
Sierra Leone	SLE	SSA	30	30	→ 0	129	130
Togo	TGO	SSA	30	32	↓ -2	129	117
Djibouti	DJI	SSA	31	31	→ 0	124	122
Kazakhstan	KAZ	ECA	31	31	→ 0	124	122
Nepal	NPL	AP	31	31	→ 0	124	122
Gabon	GAB	SSA	31	32	↓ -1	124	117
Maldives	MDV	AP	31	33	↓ -2	124	112
Ukraine	UKR	ECA	32	30	↑ 2	120	130
Liberia	LBR	SSA	32	31	↑ 1	120	122
Malawi	MWI	SSA	32	31	↑ 1	120	122
Mali	MLI	SSA	32	31	↑ 1	120	122
Moldova	MDA	ECA	33	31	↑ 2	117	122
Pakistan	PAK	AP	33	32	↑ 1	117	117
Vietnam	VNM	AP	33	35	↓ -2	117	107
Ecuador	ECU	AME	34	32	↑ 2	114	117
Niger	NER	SSA	34	33	↑ 1	114	112
Ethiopia	ETH	SSA	34	35	↓ -1	114	107
Egypt	EGY	MENA	35	32	↑ 3	105	117
Algeria	DZA	MENA	35	33	↑ 2	105	112
El Salvador	SLV	AME	35	33	↑ 2	105	112
Armenia	ARM	ECA	35	35	→ 0	105	107
Cote d'Ivoire	CIV	SSA	35	36	↓ -1	105	103
Brazil	BRA	AME	35	37	↓ -2	105	96
Peru	PER	AME	35	37	↓ -2	105	96
Zambia	ZMB	SSA	35	37	↓ -2	105	96
Timor-Leste	TLS	AP	35	38	↓ -3	105	91
Philippines	PHL	AP	36	34	↑ 2	99	111
Bahrain	BHR	MENA	36	36	→ 0	99	103
Tanzania	TZA	SSA	36	36	→ 0	99	103
Colombia	COL	AME	36	37	↓ -1	99	96
Thailand	THA	AP	36	37	↓ -1	99	96
Albania	ALB	ECA	36	38	↓ -2	99	91
Gambia	GMB	SSA	37	30	↑ 7	93	130
Macedonia	MKD	ECA	37	35	↑ 2	93	107
Mongolia	MNG	AP	37	36	↑ 1	93	103
Panama	PAN	AME	37	37	→ 0	93	96
Guyana	GUY	AME	37	38	↓ -1	93	91
Kosovo	KSV	ECA	37	39	↓ -2	93	85
Indonesia	IDN	AP	38	37	↑ 1	89	96
Bosnia and Herzegovina	BIH	ECA	38	38	→ 0	89	91
Sri Lanka	LKA	AP	38	38	→ 0	89	91

Corruption Perceptions Index 2018: Score and rank changes 2017-2018

Country	ISO3	Region	CPI Score 2018	CPI Score 2017	Change in scores 2017-2018	CPI Rank 2018	CPI Rank 2017
Swaziland	SWZ	SSA	38	39	↓ -1	89	85
China	CHN	AP	39	41	↓ -2	87	77
Serbia	SRB	ECA	39	41	↓ -2	87	77
Argentina	ARG	AME	40	39	↑ 1	85	85
Benin	BEN	SSA	40	39	↑ 1	85	85
Kuwait	KWT	MENA	41	39	↑ 2	78	85
Ghana	GHA	SSA	41	40	↑ 1	78	81
India	IND	AP	41	40	↑ 1	78	81
Turkey	TUR	ECA	41	40	↑ 1	78	81
Trinidad and Tobago	TTO	AME	41	41	→ 0	78	77
Burkina Faso	BFA	SSA	41	42	↓ -1	78	74
Lesotho	LSO	SSA	41	42	↓ -1	78	74
Bulgaria	BGR	WE/EU	42	43	↓ -1	77	71
Morocco	MAR	MENA	43	40	↑ 3	73	81
Suriname	SUR	AME	43	41	↑ 2	73	77
Tunisia	TUN	MENA	43	42	↑ 1	73	74
South Africa	ZAF	SSA	43	43	→ 0	73	71
Solomon Islands	SLB	AP	44	39	↑ 5	70	85
Belarus	BLR	ECA	44	44	→ 0	70	68
Jamaica	JAM	AME	44	44	→ 0	70	68
Senegal	SEN	SSA	45	45	→ 0	67	66
Montenegro	MNE	ECA	45	46	↓ -1	67	64
Greece	GRC	WE/EU	45	48	↓ -3	67	59
Vanuatu	VUT	AP	46	43	↑ 3	64	71
Hungary	HUN	WE/EU	46	45	↑ 1	64	66
Sao Tome and Principe	STP	SSA	46	46	→ 0	64	64
Cuba	CUB	AME	47	47	→ 0	61	62
Malaysia	MYS	AP	47	47	→ 0	61	62
Romania	ROU	WE/EU	47	48	↓ -1	61	59
Croatia	HRV	WE/EU	48	49	↓ -1	60	57
Jordan	JOR	MENA	49	48	↑ 1	58	59
Saudi Arabia	SAU	MENA	49	49	→ 0	58	57
Slovakia	SVK	WE/EU	50	50	→ 0	57	54
Mauritius	MUS	SSA	51	50	↑ 1	56	54
Oman	OMN	MENA	52	44	↑ 8	53	68
Italy	ITA	WE/EU	52	50	↑ 2	53	54
Grenada	GRD	AME	52	52	→ 0	53	52
Namibia	NAM	SSA	53	51	↑ 2	52	53
Malta	MLT	WE/EU	54	56	↓ -2	51	46
Saint Lucia	LCA	AME	55	55	→ 0	50	48
Rwanda	RWA	SSA	56	55	↑ 1	48	48
Costa Rica	CRI	AME	56	59	↓ -3	48	38
Korea, South	KOR	AP	57	54	↑ 3	45	51
Cabo Verde	CPV	SSA	57	55	↑ 2	45	48
Dominica	DMA	AME	57	57	→ 0	45	42
Georgia	GEO	ECA	58	56	↑ 2	41	46
Spain	ESP	WE/EU	58	57	↑ 1	41	42
Latvia	LVA	WE/EU	58	58	→ 0	41	40
Saint Vincent and the Grenadin	VCT	AME	58	58	→ 0	41	40
Cyprus	CYP	WE/EU	59	57	↑ 2	38	42
Czech Republic	CZE	WE/EU	59	57	↑ 2	38	42

Corruption Perceptions Index 2018: Score and rank changes 2017-2018

Country	ISO3	Region	CPI Score 2018	CPI Score 2017	Change in scores 2017-2018	CPI Rank 2018	CPI Rank 2017
Lithuania	LTU	WE/EU	59	59	→ 0	38	38
Poland	POL	WE/EU	60	60	→ 0	36	36
Slovenia	SVN	WE/EU	60	61	↓ -1	36	34
Botswana	BWA	SSA	61	61	→ 0	34	34
Israel	ISR	MENA	61	62	↓ -1	34	32
Qatar	QAT	MENA	62	63	↓ -1	33	29
Brunei Darussalam	BRN	AP	63	62	↑ 1	31	32
Taiwan	TWN	AP	63	63	→ 0	31	29
Portugal	PRT	WE/EU	64	63	↑ 1	30	29
Bahamas	BHS	AME	65	65	→ 0	29	28
Seychelles	SYC	SSA	66	60	↑ 6	28	36
Chile	CHL	AME	67	67	→ 0	27	26
Bhutan	BTN	AP	68	67	↑ 1	25	26
Barbados	BRB	AME	68	68	→ 0	25	25
Uruguay	URY	AME	70	70	→ 0	23	23
United Arab Emirates	ARE	MENA	70	71	↓ -1	23	21
United States of America	USA	AME	71	75	↓ -4	22	16
France	FRA	WE/EU	72	70	↑ 2	21	23
Estonia	EST	WE/EU	73	71	↑ 2	18	21
Japan	JPN	AP	73	73	→ 0	18	20
Ireland	IRL	WE/EU	73	74	↓ -1	18	19
Belgium	BEL	WE/EU	75	75	→ 0	17	16
Austria	AUT	WE/EU	76	75	↑ 1	14	16
Hong Kong	HKG	AP	76	77	↓ -1	14	13
Iceland	ISL	WE/EU	76	77	↓ -1	14	13
Australia	AUS	AP	77	77	→ 0	13	13
Germany	DEU	WE/EU	80	81	↓ -1	11	12
United Kingdom	GBR	WE/EU	80	82	↓ -2	11	8
Canada	CAN	AME	81	82	↓ -1	9	8
Luxembourg	LUX	WE/EU	81	82	↓ -1	9	8
Netherlands	NLD	WE/EU	82	82	→ 0	8	8
Norway	NOR	WE/EU	84	85	↓ -1	7	3
Singapore	SGP	AP	85	84	↑ 1	3	6
Sweden	SWE	WE/EU	85	84	↑ 1	3	6
Finland	FIN	WE/EU	85	85	→ 0	3	3
Switzerland	CHE	WE/EU	85	85	→ 0	3	3
New Zealand	NZL	AP	87	89	↓ -2	2	1
Denmark	DNK	WE/EU	88	88	→ 0	1	2