



RAG Strategists Advisory Note 16

“Shaping and sharing best practice in infrastructure anti-corruption”

PRECCA (2004) Section 34A / “Adequate Procedures” Defence / Monitoring and Review

Corruption risks are dynamic and will change as an organisation’s activities, geographic footprint and business relationships evolve. Anti-corruption procedures that were once effective may become outdated if they are not regularly reviewed and adjusted. Organisations should therefore treat corruption prevention as a continuous process, supported by ongoing monitoring, evaluation, and improvement.

In addition to routine reviews, organisations should reassess their anti-corruption controls in response to specific triggers. These may include changes in legislation or government policy in countries where the organisation operates, incidents or allegations of corruption, whistleblowing disclosures, internal control failures or negative media coverage. Such events often reveal weaknesses that require prompt corrective action.

A wide range of review mechanisms can be used to assess effectiveness. Internal financial controls, audit processes and investigation systems help deter, detect and respond to corruption risks. Staff surveys, training evaluations and employee feedback provide practical insight into whether policies are understood and applied in the day-to-day operations. Periodic reports to senior management further support oversight and accountability.

Organisations may also benefit from external input, including guidance from regulators, trade bodies, benchmarking against peer practices and internationally published benchmarks and codes. Independent assurance or certification against recognised anti-corruption standards can provide additional confidence, but such certification does not automatically mean that procedures are adequate for all legal or operational purposes.

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01st January 2026

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