

## Required and Desirable Documentation for ISO 37001:2016

**NOTE**      *The requirements for documented information in italics (in the table below) relate to those that are stipulated in the ISO Annex SL Harmonised Structure (HS) [previously the High Level Structure (HLS)] core text. These requirements are therefore present, in similar forms, in all ISO management system standards based upon the HLS.*

### Required Documentation

Clause	Title	(Shall) Requirement	Notes
4.3	<i>Determining the scope of the anti-bribery management system</i>	<i>The scope shall be available as documented information.</i>	<i>Periodically (typically annually) reviewed statement of the scope of the management system. <b>This can be on the same document as the policy.</b></i>
4.5	Bribery risk assessment	4.5.4 The organization shall retain documented information that demonstrates that the bribery risk assessment has been conducted and used to design or improve the anti-bribery management system.	
5.2	<i>Anti-bribery policy</i>	<i>The anti-bribery policy shall: - be available as documented information.</i>	<i>Periodically (typically annually) reviewed statement of the policy of the management system.</i>
6.2	<i>Anti-bribery objectives and planning to achieve them</i>	<i>The organization shall retain documented information on the anti-bribery management system objectives.</i>	<i>Periodically reviewed statement of the objectives of the management system and records of their attainment. <b>The statement of the objectives can be on the same document as the policy.</b></i>
7.2 7.2.1	<i>Competence General</i>	<i>The organization shall: d) retain appropriate documented information as evidence of competence.</i>	<i>Training needs analysis, Records of training delivered/received Tests of effectiveness of training.</i>
7.2.2	Employment process		This does not explicitly require documentation but will require documentation such as the following. 7.2.2.1 (a) Conditions of employment. (b) Records of notification of the anti-bribery policy and records of training relating to the policy. (c) Disciplinary procedure. (d) Policy / code of practice. (d) (2) Records relating to raising of concerns. See also 8.9. 7.2.2.2 (a) Due-diligence procedure(s) and records of due-diligence. (b) Records of reviews. (c) Records of declarations.

<b>Clause</b>	<b>Title</b>	<b>(Shall) Requirement</b>	<b>Notes</b>
7.3	Awareness and training	The organization shall retain documented information on the training procedures, the content of the training, and when and to whom it was provided.	Communications build Awareness Training builds Skills See also 7.4 below.
8.1	<i>Operational planning and control</i>	<i>The organization shall plan, implement, review and control the processes needed to meet requirements of the anti-bribery management system, and to implement the actions determined in 6.1, by:</i>  <i>c) keeping documented information to the extent necessary to have confidence that the processes have been carried out as planned.</i>	<i>Determine what documented information you must create, maintain and retain, to effectively fulfil the requirements of the following Sub-clauses 8.2 to 8.10.</i>
9.1	<i>Monitoring, measurement, analysis and evaluation</i>	<i>The organization shall retain appropriate documented information as evidence of the methods and results.</i>	<i>Monitoring, and appropriate metrics to evaluate the operation of processes of the Compliance management system and attainment of (policy) objectives.</i>
9.2	<i>Internal audit programme</i>	<i>9.2.2 The organization shall:</i> <i>e) retain documented information as evidence of the implementation of the audit programme and the audit results.</i>	<i>Records of internal audits, including any nonconformities, potential nonconformities, opportunities for improvement etcetera and consequential actions (see 10.1 below.)</i>
9.3.1	<i>Top management review</i>	<i>The organization shall retain documented information as evidence of the results of top management reviews.</i>	<i>Typically minutes of meetings, but management review could consist of other mechanisms, in addition to, or even instead of, meetings.</i>
9.3.2	<i>Governing body review</i>	<i>The organization shall retain SUMMARY documented information as evidence of the results of governing body reviews.</i>	
10.1	<i>Nonconformity and corrective action</i>	<i>The organization shall retain documented information as evidence of:</i> <i>- the nature of the nonconformities and any subsequent actions taken;</i> <i>- the results of any corrective action.</i>	<i>Records of nonconformities and consequential corrective actions, both arising from audits (see 9.2 above) and unrelated to audits. Optionally, it may be appropriate to additionally define and record the occurrence and similar management of non-compliances.</i>

<b>NOTE</b>	For guidance on additional documentation, refer to Annex A, A.17 Documented information.
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**Desirable Documentation**

<b>Clause</b>	<b>Title</b>	<b>(Shall) Requirement</b>	<b>Notes</b>
7.4	Communication		<i>This does not stipulate an explicit requirement for documentation but it will require some, such as records of appropriate communications.</i>  <i>See also 7.3 above.</i>
8.2	Due diligence	<p>These clauses do not stipulate explicit requirements for documentation but will require some including procedures, records of operations and records of reviews etcetera.</p> <p>See also Annex A, A.17 Documented information.</p>	See Annex A, A.10 Due diligence.
8.3	Financial controls		See Annex A, A.11 Financial controls
8.4	Non-financial controls		See Annex A, A.12 Non-financial controls
8.5	Implementation of anti-bribery controls by controlled organizations and by business associates		See Annex A, A.13 Implementation of anti-bribery controls by controlled organizations and by business associates
8.6	Anti-bribery commitments		See Annex A, A.14 Anti-bribery commitments
8.7	Gifts, hospitality, donations and similar benefits		See Annex A, A.15 Gifts, hospitality, donations and similar benefits
8.8	Managing inadequacy of anti-bribery controls		
8.9	Raising concerns		
8.10	Investigating and dealing with bribery		See Annex A, A.18 Investigating and dealing with bribery
9.4	Review by anti-bribery compliance function		The anti-bribery compliance function shall report at planned intervals, and on an ad hoc basis, as appropriate, to the governing body (if any) and top management, or to a suitable committee of the governing body or top management, on the adequacy and implementation of the anti-bribery management system, including the results of investigations and audits.