A Appendices

1: Anti-corruption policy template

This section has the main headings that have been extracted from a number of anti-corruption policy documents and applied to the events sector. As well there are suggestions for the information in the brackets [ ]. This is not complete. It is brief on purpose as there is always the temptation to "tick this box". Too much detail can be as dangerous as too little, because no one will read it or bother to understand it. Hence this must come from the risk management meetings where the team agree on its applicability to the specific event.

The information below must be adapted for the specific event and the legal socio/cultural environment.

1.   Overview
[example "this policy sets out the standards and provides guidance on how to minimise corruption in the event planning, implementation and at the event venue or site"]

2.   Message
[A personal message from the event team leader on the importance of integrity and the long term consequences of corrupt practices on the event, the event team and people's careers]

3.   Scope
[Who does this policy apply to? Staff, volunteers, suppliers and any on-site personnel.]

4.   Applicable laws
[e.g the UK Bribery Act 2010, the Commonwealth Criminal Code in Australia, the Canadian Corruption of Foreign Public Officials Act (CFPOA), the Foreign Corrupt Practices Act (FCPA) in the US.]

5.   Key definitions

[Easy to understand definitions of the most likely types of corruption.]

6.   Approach

♦   [The main sponsor or government department will have their own corruption control policy which can be referred to here.

♦   Corruption as a real risk that must prevented using a risk management approach.

♦   Describe prohibited conduct.

♦   On-site/ venue issues such as dealing with the public, gifts and facilitation payments

♦   Refer to the Code of Conduct, if it exists.

♦   Team must be aware that they and the event organisation may be liable for the corrupt practices of third parties associated with the event.]

7.   Roles and Responsibilities

♦   [The person or team responsible for preventing, monitoring and managing the anti-corruption in the event project and the event site.

♦   The person to report to if corruption is suspected.

♦   The procurement team must ensure due diligence is performed on the suppliers prior to engagement.

♦   Event team must ensure the suppliers, vendors and volunteers are aware of the anti- corruption policy and if applicable, the code of conduct.]

8.   Requirements of event team

♦   [All staff to attend and actively take part in the event risk management discussions and meetings.

♦   Event team staff should understand what corruption is, the types of corruption and the effects to the event and their careers.

◆   Each member must take seriously any reports of corruption
    from on-site staff, volunteers and attendees and report to
    relevant team member.

◆   The team must make sure suppliers, vendors and on-site staff
    are aware of the policies and the expectations with regard to
    any corruption.]

9.   Breaches

[Depending on the severity of the corruption and its legal status
the penalty can range from

◆   correction,

◆   warning,

◆   restricting to certain task or areas of responsibility,

◆   outright banning,

◆   legal charges.]

10.   Extras

[Depending on the size of the event, the event budget and the
level of corruption risk, there can be a section in the policy with
examples and scenarios. Such as

" *A representative of the main sponsor of the event has asked you for ten
extra tickets to the VIP area of the event. Although you have the authority
to grant free tickets to the event, you need to ask the advice of the person
on the event team who is responsible for anti-corruption and the request
for extra tickets must be noted.* "]

2: AI and corruption

Machine learning needs large data to be effective. Large data needs stable parameters, variables and a classification (or category) system. The limitation is found in the word 'event'. It means out of the ordinary. The very basis of the event sector, the newness and innovation, is the issue when trying to construct a large data set. At the same time the basis of corruption is secrecy. It does not like to be recorded. So corruption can only be detected by proxies and anomalies. That is not to dismiss using Artificial Intelligence at all. Venues, for example, can use data collected over years to look for anomalies in supplier quotes. Although the events will come and go, the suppliers of many services such as sound, lights, food and beverage will be the same for many of the events. Also, as discussed in the section on fraud, the takings of the vendors at an event can be analysed. The parameters and variables include: size of crowd, demographics, position of the vendor on site, type of event and many more can create a matrix and used to identify anomalies in vendor reporting. Money laundering is a constant battle between the corrupt and the banks. The banks have sophisticated systems to filter data and the combination creates the red flags. But, then the corrupt ensure they are not caught by the filters. Every system can be gamed.

Any repeat event can collect longitudinal data and identify corruption. AI can easily predict what would be expected. This is why corruption in sports events is so quickly and easily recognised. As AI is more developed and the machine 'learns' more, we will see more and more sports exposed. The previously hidden, petty corruption will be uncovered as the machine learning exponentially increases. Exhibitions and conferences, as they are often a repeat event in standard venues can collect data. This can happen for the festivals, concerts and special events but its very newness works against the AI model. A local area with a centralised event team, such as a council area, already collects data about the events in their region. This is a valuable source for AI to trawl and look

for patterns and anomalies. Figure A.1: *Anomaly detection using A.I* shows the schema where the AI uses pattern analysis to look for 'outliers' such as unusual transactions and proxy measures. This is currently performed with tools such as regression analysis and data analysis.
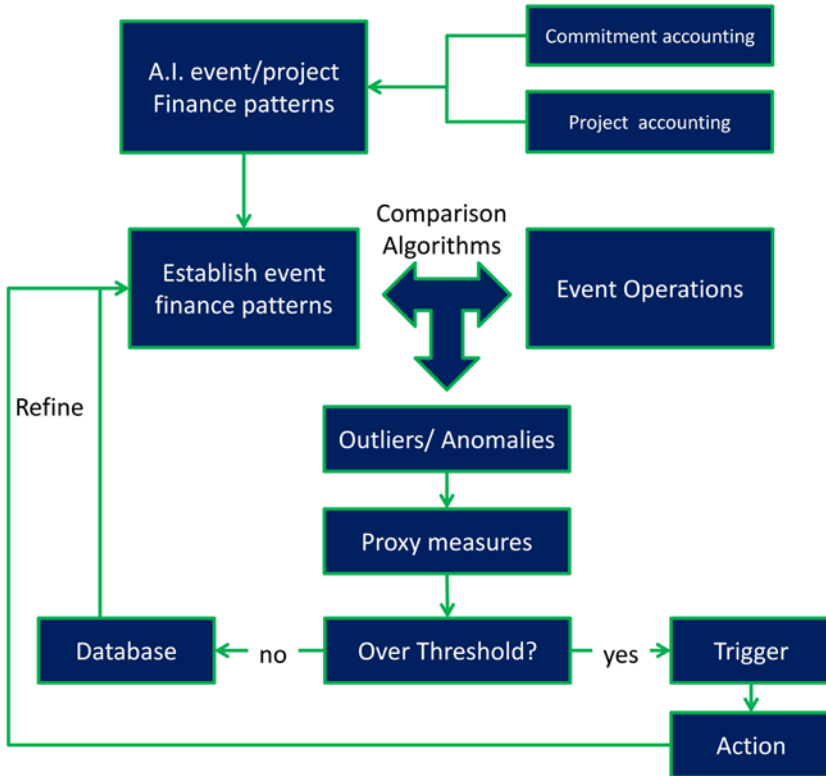

Figure A.1: Anomaly detection using A.I

However, as pointed out by the ICAC, the opportunities for corruption using AI are manifold. (OECD, 2024), (Legislative Council, 2024). The ability of AI to completely forge or subtly alter documents is a risk. It can include grant applications, guarantees to perform, databases, contracts, conflict of interest declarations, invoices, licenses and CVs. Photos, videos, music, emails, text messages or any other digital file can be changed. This can be difficult for a person to do, but is very easy using AI. A subtle change of a full stop in a quoted price can create chaos. The answer too often is

that AI will pick up the fraud. But this is the snake biting its tail. If it can be picked up, it can be falsified.

Currently AI looks a threat to all digital communication and information. Verifying information must use a digital medium. That, in itself, can be easily falsified using AI. AI generated fraud and the like is only just starting. No guarantee anything that is delivered over a digital medium will be safe. This opens up a new Pandora's box.

Of interest the ICAC points out that these documents and other digital media can look genuine but be false because of the current limitations of AI. This eliminates any blame as there is no intention to deceive. (OECD, 2024)

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4: Acronyms

ACCC Australian Competition and Consumer Commission

ALARP As Low As Reasonably Practicable

BPFI Banking and Payments Federation Ireland

CBA Cost/benefit analysis

CCDI Central Commission for Discipline Inspection

CiC Commercial in Confidence

CISA U.S. Cybersecurity and Infrastructure Security Agency

CTR currency transaction reporting

DOJ US Department of Justice

FATF Financial Action Task Force

ICAC Independent Commission Against Corruption

ICC International Chamber of Commerce

ICGN International Corporate Governance Network

IPACS International Partnership Against Corruption in Sport

ISO International Organization for Standardization

LOPA Layers of Protection Analysis

NDA Non Disclosure Agreement

PEP Politically Exposed Persons

SEC Securities and Exchange Commission

TI Transparency International

UEFA Union of European Football Associations

UN United Nations

UNODC United Nations Office on Drugs and Crime