# Annex C: Surveillance Plan

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| **Surveillance PlanISO 37001:2016** |
| **1**: Initial Audit**2:** Surveillance 1 Audit**3**: Surveillance 2 Audit**4**: Recertification Audit | **Plan** |
| **1****(202X)** | **2****(202X)** | **3****(202X)** | **4****(202X)** |
| **4 Context of the organization** |
| **4.1** | Understanding the organization and its context |  |  |  |  |
| **4.2** | Understanding the needs and expectations of stakeholders |  |  |  |  |
| **4.3** | Determining the scope of the anti-bribery management system |  |  |  |  |
| **4.4** | Anti-bribery management system |  |  |  |  |
| **4.5** | Bribery risk assessment |  |  |  |  |
| **5 Leadership** |
| **5.1** | Leadership and commitment |  |  |  |  |
| **5.2** | Anti-bribery policy |  |  |  |  |
| **5.3** | Organizational roles, responsibilities and authorities |  |  |  |  |
| **6 Planning** |
| **6.1** | Actions to address risks and opportunities |  |  |  |  |
| **6.2** | Anti-bribery objectives and planning to achieve them |  |  |  |  |
| **7 Support** |
| **7.1** | Resources |  |  |  |  |
| **7.2** | Competence |  |  |  |  |
| **7.3** | Awareness |  |  |  |  |
| **7.4** | Communication |  |  |  |  |
| **7.5** | Documented information |  |  |  |  |
| **8 Operation** |
| **8.1** | Operational planning and control |  |  |  |  |
| **8.2** | Due diligence |  |  |  |  |
| **8.3** | Financial controls |  |  |  |  |
| **8.4** | Non-financial controls |  |  |  |  |
| **8.5** | Implementation of anti-bribery controls by controlled organizations and by business associates |  |  |  |  |
| **8.6** | Anti-bribery commitments |  |  |  |  |
| **8.7** | 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 |  |  |  |  |
| **9 Performance evaluation** |
| **9.1** | Monitoring, measurement, analysis and evaluation |  |  |  |  |
| **9.2** | Internal audit |  |  |  |  |
| **9.3** | Management review |  |  |  |  |
| **9.4** | Review by anti-bribery compliance function |  |  |  |  |
| **10 Improvement** |
| **10.1** | Nonconformity and corrective action |  |  |  |  |
| **10.2** | Continual improvement |  |  |  |  |
| **11 Additional requirements**  |
|  | Use of Logo |  |  |  |  |
|  | List of documents included in the audited MS |  |  |  |  |
| Notes and comments: |   |

*For completed visits, mark “X” in the box for each clause/process covered.*

*For planned visits, mark “O” in the box for each clause/process to be covered.*