

Global Corruption: Regulation, Compliance and Enforcement

CORP7160

Course Description

This course introduces students to the theory and practice of global anti-corruption compliance. Topics covered include the definition, identification and measurement of corruption; the United Nations Convention Against Corruption (UNCAC); the OECD Convention on Combatting Bribery of Foreign Public Officials; the U.S. Foreign Corrupt Practices Act; the UK Bribery Act; investigation, enforcement and resolution of corrupt activities; jurisdiction and corporate liability; anti-corruption risk assessment and compliance programs; international organizational responses to corruption.

Readings

All readings for this course are available in a [custom-made textbook, which is available for purchase through XanEdu](#).

Weekly Schedule

<u>Week</u>	<u>Topic</u>
1	What is Corruption, What is its impact and How is it Identified and Measured?
2	International Conventions and Overview of National Anti-Corruption Laws
3	The United States Foreign Corrupt Practices Act
4	U.K. Anti-Bribery Law
5	Investigation and Enforcement
6	Case Study: The United Kingdom
7	Jurisdiction and Corporate Liability
8	Risk Assessment and Compliance Programs

Course Outcomes

Upon completion of the course, students will be able to:

- CO 1. Explain the global impact of corruption and challenges in addressing corruption
- CO 2. Describe the conventions and laws designed to address corruption, with particular emphasis on bribery
- CO 3. Analyze company activities to determine whether they violate the U.S Foreign Corrupt Practices Act, the UK Bribery Act, and other laws
- CO 4. Recognize the similarities and differences between national anti-corruption laws of the US and the UK and discuss the impact of these laws on companies' global business activities
- CO 5. Identify red flags in business activities that would require further assessment for compliance with anti-corruption laws
- CO 6. Explain how potential violations of the U.S Foreign Corrupt Practices Act and UK Bribery Act are investigated, prosecuted and resolved
- CO 7. Articulate the key elements of a global anti-corruption risk assessment and compliance program

Overview of Course Activities

Activity #1: Tutorial Questions

The Tutorial Questions are weekly assignments designed to ensure that you have an accurate understanding of the key points in the readings. Answers to these questions can be any length. Your goal should be to accurately state the relevant points of law as concisely as possible. Your professor will provide feedback and guidance on your responses. **Answers are due by 11:59PM on Wednesday.**

Tutorial Questions for week 1 are available with the [first week's assignments](#). Tutorial Questions for the remaining weeks of the course are available on the Blackboard course site.

Activity #2: Discussion Questions

A "threaded discussion" is a discussion forum that allows students to respond to questions posted by the professor (original responses), which can then be read by other users who add their own comments in response (secondary postings). Unlike chat rooms and other "real-time" interaction forums, threaded discussions do not require different users to be logged on at the same time.

Discussion questions are assigned each week. **Original responses to these questions must be posted by Thursday at 11:59PM.** Original responses must be at least **250 words** and must incorporate concepts from the lectures and assigned readings.

Secondary Responses/Postings: Each student must post **two or more** secondary responses to other students' postings **for each discussion question**. Secondary responses are due by **11:59PM on the Monday following the week in which the questions were assigned**. They must be a minimum of **150 words** and, like original responses, should incorporate concepts from the lectures and assigned readings. Students are encouraged to embark on interactive discussions that go beyond the minimum number of secondary postings.

Although the discussion board is expected to be student-driven, professors will be participating in the discussions as well. Discussion Questions for week 1 are available with the [first week's assignments](#). Discussion Questions for the remaining weeks of the course are available on the Blackboard course site.

Activity #3 - Broadening the Scope of the FCPA [Law Students] / Anti-Corruption Advice for Doing Business in Developing Countries [Non-Law Students]

This activity is due on Saturday of Week 2. Further information is available on the Blackboard course site.

Activity #4 –Risks inherent in Dealing with Third Parties [Law Students] / Bribery Act and MOJ Guidance Risk Management [Non-Law Students]

This activity is due on Saturday of Week 4. Further information is available on the Blackboard course site.

Activity #5 - Legislating the Global Declaration Against Corruption [Law Students] / Clarifying the Anti-Corruption Metrics [Non-Law Students]

This activity is due on Saturday of Week 6. Further information is available on the Blackboard course site.

Activity #6 –Updating a Corporate Compliance Policy [Law Students] / Risk Assessment Program [Non-Law Students]

This activity is due on Saturday of Week 8. Further information is available on the Blackboard course site.

Grading

Activity #1: Tutorial Questions (25% of final grade)

Activity #2: Discussion Questions (25% of final grade)

Activity #3: Broadening the Scope of the FCPA [Law Students] / Anti-Corruption Advice for Doing Business in Developing Countries [Non-Law Students] (12.5% of final grade)

Activity #4: Risks inherent in Dealing with Third Parties [Law Students] / Bribery Act and MOJ Guidance Risk Management [Non-Law Students] (12.5% of final grade)

Activity #5: Legislating the Global Declaration Against Corruption [Law Students] / Clarifying the Anti-Corruption Metrics [Non-Law Students] (12.5% of final grade)

Activity #6: Updating a Corporate Compliance Policy [Law Students] / Risk Assessment Program [Non-Law Students] (12.5% of final grade)

Responses to the Tutorial Questions and Discussion Questions will be graded each week in which they are assigned. At the end of the course, the lowest grade you receive for the Tutorial Questions and for the Discussion Questions will be dropped and will not be counted towards your final grade for the course. The purpose of this policy is to accommodate unanticipated professional or personal scheduling conflicts that may arise during the course.

IMPORTANT: You are required to post a *minimum* of one 250-word main post plus two 150-word secondary posts to each weekly discussion thread/topic. Your weekly discussion board grade will be based upon the quantity and overall quality of your postings.

Late Activities: For purposes of grading, activities and assignments that are submitted late will be treated as not having been submitted at all. The professor may make exceptions to this policy for true emergencies, such as serious illness. Requests for exceptions should be made in advance of the deadline, if possible. The professor's decision to grant or deny a request for an exception is final and unreviewable.

The following grade scale will be used to calculate final grades. The following is an explanation of how points equate to grades, based on a 4.33-point scale:

Grade Quantitative Qualitative Definition

A+	4.33	Excellent	Superior understanding of the content and method of the course, extraordinary ability to recognize relationships between concepts, initiative in doing work
A	4.00		
A-	3.67		
B+	3.33	Good	Good understanding of the content and method of the course, demonstrated ability to recognize relationships between concepts, substantial achievement of course objectives and fulfillment of course requirements.
B	3.00		
B-	2.67	Fair	Rudimentary understanding of the content and method of the course, limited recognition of relationships between concepts, basic but incomplete achievement of course objectives and requirements.
C+	2.33		
C	2.00		
C-	1.67	Unsatisfactory	Little understanding of the content and method of the course, inability to demonstrate minimum recognition of relationships between concepts, unsatisfactory achievement of course objectives and requirements.
D+	1.33		
D	1.00		
F	0.00	Failure	Lack of understanding of the content and method of the course, failure to achieve objectives and/or complete requirements of the course.

Grades are based strictly on individual performance, not on any external factors (e.g., tuition reimbursement policies at your place of employment). Any questions about grades must be made in writing.