

<b>Document Title</b>	Anti-Fraud, Corruption and Bribery Policy		
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# **SCOTTISH ARCHERY**

## **ANTI-FRAUD, CORRUPTION AND BRIBERY POLICY**

## OVERVIEW

This document sets out Scottish Archery's anti-fraud, anti-corruption and anti-bribery policy and the steps that must be taken where fraud is suspected or discovered. All staff and members of the Board should familiarise themselves with the policy and be aware of its contents from the point of induction. Any person who becomes aware of any fraud, corruption or bribery or other illegal act and who does not follow the terms of this policy may be subject to disciplinary action.

## Definitions

**Fraud** - theft by deception. It is deliberate intent to permanently deprive a person or organisation of money or goods through the falsification of any records or documents.

**Bribery** - inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. Acts of bribery or corruption are designed to influence the individual in the performance of their duty and incline them to act dishonestly.

**Corruption** - where someone is influenced by bribery, payment or benefit in kind to unreasonably use their position to give some advantage to another.

**Misappropriation** - inappropriate use of company property or employed time for personal gain/profit It is expected that all volunteers and staff will act with the utmost integrity and ensure adherence to all relevant regulations, policies and procedures. A culture of openness, honesty and probity is strongly encouraged.

## 1. Introduction:

Scottish Archery is committed to carrying out its activities in an honest and ethical manner and to observe the provisions of the Bribery Act 2010, in respect of its conduct.

The purpose of this policy is to:

- a) Set out Scottish Archery's responsibilities and those of Scottish Archery's volunteers and staff, in observing and upholding our position on fraud, bribery and corruption; and
- b) Provide information and guidance to Scottish Archery's volunteers and staff on how to recognise and deal with fraud, bribery and corruption issues

Scottish Archery's takes a zero-tolerance approach to any act of bribery and/or corruption and expects everybody to conduct themselves in a professional manner at all times when representing our sport.

We are committed to implementing effective systems and procedures and enforcing them to counter bribery.

This Policy Applies To:

- All members of Scottish Archery and any full time or part time staff, officials and volunteers
- or any other persons providing services to us

## 2. Gifts and Hospitality

This policy does not prohibit giving and receiving promotional gifts of low value to a maximum of £25 Sterling and normal and appropriate hospitality.

In certain circumstances however, gifts and hospitality may amount to bribery and all persons mentioned above must comply strictly with Scottish Archery's appropriate policies in respect of gifts and hospitality.

### What is not Acceptable?

It is not acceptable for you (or someone on your behalf) to:

- Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that business advantage will be received, or to reward a business advantage already given
- Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure
- Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that business advantage will be offered in return

- Threaten or retaliate against a Scottish Archery volunteer, member of staff or third party who has refused to commit a bribery offence or has raised concerns under this policy
- Engage in any activity that might lead to a breach of this policy

### 3. Facilitation Payments

We do not make and will not accept facilitation payments or “kickbacks” of any kind.

Facilitation payments are typically small, unofficial payments made to secure or expedite a routine action by any official. Kickbacks are typically payments made in return for a business favour or advantage.

If you are asked to make a payment on behalf of Scottish Archery, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided.

You should always ask for a receipt which details the reason for the payment.

In the event that a facilitation payment is being extorted, or if you are forced to pay under duress, you must record the payment and report it without delay to the Scottish Archery Chief Executive (or any board member if the CEO suspected of fraud).

In general, all staff and volunteers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted.

### 4. Donations:

We do not make contributions of any kind to political parties. No charitable donations will be made whatsoever unless that this has been agreed by a vote at an AGM.

### 5. Record Keeping:

We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties.

All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our Financial Procedure policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers, and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off book” to facilitate or conceal improper payments.

### 6. Raising A Concern

All members, volunteers and staff will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.

No person will suffer any detriment as a result of raising genuine concerns about bribery and corruption even if they turn out to be mistaken.

If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with the Scottish Archery Chief Executive (or any board member if the CEO suspected of fraud).

Malpractice may be reported by following the procedure set out in the Whistleblowing Policy.

### 7. What to do if you are a victim of Fraud, Bribery or Corruption

It is important that you report as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

All instances of bribery or attempted bribery must be reported promptly to the Chief Executive or any board member if the CEO suspected of fraud

## 8. Protection

Those who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions.

Scottish Archery will support anyone who raises genuine concerns in good faith under this policy.

Scottish Archery is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future.

## 9. Monitoring:

The effectiveness of this policy will be regularly reviewed by the Board.

## 10. Duration

This policy will remain in force until reviewed as appropriate. Ideally this will be for a period of 3 years from the review date noted at the top of this document.

Prior to the end of the 3 year period, or earlier if required, this policy will be reviewed by an appropriate Director, Chief Executive Officer or appropriate member of staff.

## APPENDIX I

### Betting and Bribery:

Any participant or Scottish Archery official shall:

- not place or attempt to place a bet on archery competitions or events in which he or his club participates or is organised under the auspices of Scottish Archery
- not solicit or facilitate or attempt to solicit or facilitate, another person to bet on an archery competition or event in which he or his club participates or is organised under the auspices of Scottish Archery
- not offer or attempt to offer a bribe in order to fix or contrive a result or the progress of a competition or event in which he or his club participates or is organised under the auspices of Scottish Archery
- report any approach or other activity which contravenes archery's rules on betting and co-operate with any investigation into suspected integrity issues in relation to bribery, corruption, and betting