



# Anti-corruption, fraud and bribery policy

<b>Name of Author</b>	<i>Helen Bushell</i>
<b>Approved by</b>	<i>The Board of Directors</i>
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## **1. Policy Statement**

- 1.1 Hockey Wales is committed to conducting all of its business in an honest and ethical manner, and has a zero tolerance policy towards fraud, bribery and any form of dishonesty in its business and transactions.
- 1.2 Hockey Wales will uphold all laws relevant to countering bribery, fraud and corruption in all the jurisdictions in which it operates. However, no matter where the organisation, its staff, members (including volunteers) or agents operate, it and they must abide by the laws of the UK, including the Bribery Act 2010, in respect of conduct both at home and abroad.
- 1.3 Bribery and corruption are punishable for individuals by up to ten years imprisonment and or an unlimited fine, and if Hockey Wales is found to have taken part in corruption it could also face a fine and be excluded from certain opportunities as well as suffering damage to its reputation.
- 1.4 Hockey Wales could also attract liability under the Bribery Act 2010 if a person associated with it is found to have paid a bribe on its behalf, and Hockey Wales did not have adequate procedures in place to prevent such conduct. Hockey Wales therefore takes its legal responsibilities very seriously. Likewise fraud may lead to civil and/or criminal proceedings.
- 1.5 Any allegation that an employee, Director, volunteer, contractor, member or anyone else acting on behalf of Hockey Wales has acted in a manner that is illegal or inconsistent with this Policy will be treated seriously, regardless of the seniority of those involved. Disciplinary action up to and including dismissal or expulsion may result. Where it is believed that a criminal offence may have been committed, the police and other relevant bodies may be informed.

## **2. Objectives of the Policy**

- 2.1 The aims of this Policy are to:
  - a. promote a culture of honesty, integrity and professionalism;
  - b. set out Hockey Wales's responsibilities, and of those working for or on behalf of Hockey Wales, in observing and upholding the organisations position on bribery, fraud and corruption; and
  - c. provide information and guidance to those working for or on behalf of Hockey Wales on how to recognise and address bribery, fraud and corruption issues.

## **3. Application of the Policy**

- 3.1 This policy applies to the conduct of all those representing Hockey Wales and any third party acting on its behalf, a non-exhaustive list of which includes permanent and fixed term staff, consultants, contractors, trainees, seconded staff, homeworkers, casual workers, agency staff, volunteers, interns, agents, sponsors, agents, members or any other person associated with Hockey Wales, any of its subsidiaries or their employees and volunteers, wherever they may be located in this Policy.
- 3.2 Hockey Wales will draw this policy to the attention of consultants and contractors through its procurement processes.

3.3 This Policy should be read in conjunction with other Hockey Wales Policies, Procedures and Regulations such as the:

- a. Financial Regulations;
- b. Conflict of Interest Policy;
- c. Gifts and Hospitality Policy;
- d. Disciplinary Procedures and Regulations

#### **4. Bribery**

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. The advantage sought or the inducement offered does not have to be financial or remunerative in nature, and may take the form of improper performance of an activity or function.

#### **5. Gifts and Hospitality**

Hockey Wales has a separate Hospitality and Gifts policy. In either the giving or receiving of gifts or hospitality, there must be no explicit or implicit attempt to influence third parties or be influenced by third parties in relations with Hockey Wales.

#### **6. What is not acceptable?**

- 6.1 It is not acceptable for any person representative of Hockey Wales (or someone on their behalf) to:
- a. give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
  - b. 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;
  - c. accept payment from a third party that they know or suspect is offered with the expectation that it will obtain a business advantage for them;
  - d. accept a gift or hospitality from a third party if they know or suspect that it is offered or provided with an expectation that a business advantage will be provided by Hockey Wales in return;
  - e. threaten another representative of Hockey Wales who has refused to commit a bribery offence or who has raised concerns under this policy; or
  - f. engage in any activity that might lead to a breach of this policy.
- 6.2 Notwithstanding Hockey Wales' zero tolerance approach to bribery, the welfare of its staff and representatives is the primary concern, and Hockey Wales does not require its representatives to do anything which might jeopardise their health and or safety. In the event that representatives of Hockey Wales are threatened or coerced into engaging in conduct which might amount to breach of this Policy, they must act in a way which will safeguard their health and safety. In these circumstances Hockey Wales will not take action against the member concerned, who should report these events in accordance with section 10 below.
- 6.3 Hockey Wales would only makes charitable donations that are legal and ethical under local laws and practices. No donations of any kind must be offered or made without the prior approval of the Chief Executive Officer or Board of Directors.

## **7. Fraud**

- 7.1 There is no precise legal definition of fraud. It is generally taken to involve theft - the removal of cash or assets to which the fraudster is not entitled - or false accounting - the falsification or alteration of accounting records or other documents. Hockey Wales is potentially exposed to:
- 7.1.2 External fraud, perpetrated by individuals outside the organisation;
  - 7.1.3 Internal fraud, perpetrated by management or other employees; and
  - 7.1.4 Collusion - either within the or between staff and outsiders.
- 7.2 Hockey Wales applies its funds to its strategic aims. Any loss through fraud will reduce the effectiveness of Hockey Wales's ability to deliver its objectives and fraud or attempted fraud will be seen as a very serious matter, and will lead to disciplinary action being taken against employees or other representatives, potentially leading to dismissal, and possibly to legal action against all individuals or corporate entities involved in the fraud or potential fraud.
- 7.3 Hockey Wales will investigate all reports of fraud or potential fraud. These should be reported in the first instance to the Chief Executive Officer who will determine, in conjunction with a Board member, whether there is sufficient evidence or threat to Hockey Wales to justify further investigation. The investigation will be conducted either by appropriate staff or by appointed individuals outside of the organisation. The Chair of the Board will be informed of the start of any investigation, and the Board of Directors will be informed of the outcome of the investigation. It may be necessary to preserve confidentiality during investigations and any disciplinary procedures following from the investigation. Where there is any report of fraud against the Chief Executive Officer or Chair of the Board, the Board of Directors (excluding the CEO and Chair) will be informed immediately.
- 7.4 As appropriate, Hockey Wales will report fraud or attempted fraud to the police. Hockey Wales will give full assistance to the police in any enquiries.
- 7.5 Hockey Wales will seek to restore its assets, or recover financial losses against fraudsters.

## **8. Responsibilities**

- 8.1 Ultimate responsibility for this Policy rests with the Hockey Wales Board of Directors however, the Board will require the Chief Executive Officer to ensure that this Policy is applied effectively.
- 8.2 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for Hockey Wales or under its control. All representatives of Hockey Wales are required to avoid any activity that might lead to, or suggest, a breach of this policy.

- 8.3 Any representative of Hockey Wales who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct in the case of an employee, or expulsion from the Governing Body for members. Hockey Wales reserves the right to terminate any contractual relationship with contractors, agents or consultants if they breach this policy.

## **9. Record Keeping**

- 9.1 Hockey Wales will keep relevant financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.
- 9.2 Hockey Wales staff must declare and the organisation will keep a written record of all hospitality or gifts in accordance with the Hospitality and Gifts Policy.
- 9.3 All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

## **10. How to raise a concern**

All employees, Directors, volunteers, contractors, members or anyone else acting on behalf of Hockey Wales are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If an individual is unsure whether a particular act constitutes bribery or corruption, or if they have any other queries, these should be raised with their line manager or the staff member that acts as the link into Hockey Wales. Concerns should be reported in writing as quickly as possible. Hockey Wales will take all reasonable steps to protect the confidentiality of those raising concerns.

## **11. Protection**

Hockey Wales 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. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any representative of Hockey Wales believes that they have suffered any such treatment, they should inform their line manager or contact point into the organisation immediately. If the matter is not remedied it may be raised formally using the relevant Grievance Procedure for staff members or the Complaints Procedure for non staff members.

## **12. Monitoring and Review**

- 12.1 The Chief Executive Officer and the Board of Directors will monitor the effectiveness and review the implementation of this Policy considering its suitability, adequacy and effectiveness. Where possible, any improvements identified will be made as soon as possible. Formal reviews will be conducted every 2 years. Internal control systems and procedures will be subject to reviews to provide assurance that they are effective in countering bribery and corruption.

12.2 This Policy does not form part of any employee's contract of employment and it may be amended at any time.

### **13. Further Information**

For further information about this policy or any aspect of Hockey Wales' Anti-corruption Fraud and Bribery Policy, please contact:

Hockey Wales

Sport Wales National Centre

Sophia Gardens

Cardiff

CF11 9SW



[www.hockeywales.org.uk](http://www.hockeywales.org.uk)



0845-045-4303



[info@hockeywales.org.uk](mailto:info@hockeywales.org.uk)



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