



Scottish Disability Sport

Anti-Corruption & Bribery Policy

Reviewed by Board – August 2023

About this Policy

It is the policy of Scottish Disability Sport (SDS) to conduct business in an honest and ethical manner. SDS takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all business dealings and relationships in accordance with the Bribery Act 2010.

Anyone who breaches this policy will face disciplinary action in line with the Association's Human Resources Policies & Procedures, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract or association terminated with immediate effect.

This policy applies to all persons working for SDS or on behalf of the Association in any capacity, including employees at all levels, Directors, staff, athletes, coaches, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

What is Bribery?

Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Bribery includes offering, promising, giving, accepting or seeking a bribe.

All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with the CEO.

Specifically, you must not:

- give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
- give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;

You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

Gifts

Directors and staff may accept gifts of a low value such as calendars, diaries and pens. It is not necessary to ascertain the exact value of such gifts but anything that appears to be worth more than £100 must be formally recorded on the Association's Register of Interests which will be maintained by the Senior Administrator. Staff should exercise careful judgement in such cases. Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers and business partners.

The offer of a gift should be reported to the CEO who will decide based on the nature, volume and origin of the gift whether it should be refused or accepted.

Hospitality

Working lunches provided on a modest scale and on an occasional basis are part of normal business practice and staff are not required to obtain formal approval to attend them. However if staff receive a prior invitation to a more formal lunch or dinner, they must declare their intention to attend to their line manager.

As with gifts, the refusal of any invitation may cause embarrassment and this must be taken into account by anyone considering or approving such an invitation. Invitations to other events such as launches, conferences or sporting events etc. should be subject to the same scrutiny as above.

Invitations to attend all-expenses paid study tours, site inspections or product demonstrations must have prior approval from the CEO particularly if overseas travel is involved.

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services. A gift or hospitality will not be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

Record-Keeping

In order to counter any accusation or suspicion of improper conduct, SDS will maintain a central Register of Interests. This register will be maintained by the Senior Administrator.

All gifts and offers of hospitality with a value in excess of £100 should be recorded on the register. This applies whether they have been accepted or declined. The register will be inspected annually.

You must also submit all expenses claims relating to hospitality, gifts or payments to third parties and record the reason for expenditure.

All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

How to Raise a Concern

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify the CEO or report it in accordance with the SDS Whistleblowing Policy as soon as possible.

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