

# Hockey Wales Anti-Corruption, Fraud & Bribery Policy



<b>Name of Author</b>	Chief Executive Officer
<b>Approved by</b>	Board of Directors
<b>Approval dates</b>	2 October 2013 (version 1) 16 September 2015 (version 2) 4 October 2017 (version 3) 16 September 2019 (version 4) 11 January 2021 (version 5)
<b>Review Date</b>	September 2021

## **1. Policy Statement**

- 1.1 Hockey Wales is committed to conducting all 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 fraud, bribery, 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 England and Wales, 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 purportedly 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 investigated, 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 will 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 fraud, bribery, 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, trainees, seconded staff, homeworkers, casual workers, agency staff, volunteers, interns, agents, sponsors, members or any other person associated with Hockey Wales, any of its subsidiaries or their employees and volunteers, wherever they may be located.
- 3.2 Consultants and contractors must sign a commitment, as part of their contract, to follow this policy as a condition of working for Hockey Wales.
- 3.3 This Policy should be read in conjunction with other Hockey Wales Policies and Procedures such as the:
  - a. Financial Procedures.
  - b. Conflict of Interest Policy.
  - c. Hospitality and Gifts Policy.
  - d. Disciplinary Policy and Procedures

### 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. Hospitality and Gifts

Hockey Wales has a separate Hospitality and Gifts policy. In either the giving or receiving of hospitality or gifts, 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 representative of Hockey Wales (or someone on its behalf) to:
- a. give, promise to give, or offer, a payment, hospitality or gift with the expectation or hope that an advantage will be received, or to reward an advantage already given.
  - b. give, promise to give, or offer, a payment, hospitality, or gift to a local official, agent or representative to "facilitate" or expedite a routine procedure - *we must exercise particular care when dealing with government officials to ensure there can be no suggestion of impropriety. Nothing must be given, or promised to be given, including by any third party, that could be construed as intending to influence the decision of government or political employees, officers or candidates*
  - c. accept payment from a third party that they know, or suspect is offered with the expectation that it will obtain an advantage for them.
  - d. accept hospitality or a gift from a third party if they know or suspect that it is offered or provided with an expectation that an advantage will be provided by Hockey Wales in return.
  - e. threaten another representative of Hockey Wales who has refused to commit a fraudulent 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 make 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:
- a. External fraud perpetrated by individuals outside the organisation.
  - b. Internal fraud, perpetrated by management or other employees; and
  - c. Collusion - either with 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, or the Chair of the Board of Directors should the Chief Executive Officer be the person of concern, who will determine, in conjunction with a Board member, whether there is enough 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 and / or the Chair of the Board, the Board of Directors (excluding the CEO and / or the 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 The 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. This may result in dismissal for gross misconduct in the case of an employee, or expulsion from Hockey Wales 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 All Hockey Wales full time, part time and casual employees, the President, Board Directors, regional chairs and regional committee members, members of working groups, task forces or similar appointed by Hockey Wales for any purpose, national coaches and team management must declare all hospitality and / or gifts received in accordance with the Hockey Wales Hospitality and Gifts Policy. Hockey Wales will keep a written record of all such declarations.
- 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, 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 to 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 the staff member that acts as the link to Hockey Wales 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 year. 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.

## Further Information

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

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