



# Bribery and Corruption Policy

## Approval

Approved by	Owner	Dept	Date
Governance Committee	Head of Operations	Operations	21/03/2022

## Document History

Version	Summary of Changes	Document Status	Date
v0.1	Branding changes, change in job title for owner of gift tracker and where the tracker is stored. Inclusion of board members in the policy	Draft	28/02/2022
v0.2			

## Review History

Reviewed by	Head of Operations
Date of last review	February 2022
Date of next review	February 2024

## Bribery and Corruption Policy

### Purpose of this policy

The aim of this policy is to ensure all employees and board members understand the Scottish Gymnastics stance on bribery, to provide a procedure if employees or board members are concerned that bribery or corruption is happening within the company and to ensure that no bribery or corruption occurs. This policy is written in response to the Bribery Act 2012 requirements.

The intention of this policy is to limit Scottish Gymnastics and its board members and employees' exposure to bribery, while providing clear guidelines on how to deal with the topic should it arise.

This policy is not meant to prohibit the following practices providing they are customary within the gymnastics industry and are reasonable / proportionate and are properly recorded:

- Normal and appropriate hospitality.
- The giving of a ceremonial gift at a competition or at another special time.
- The offer of resources to assist the person or body to decide more efficiently provided that they are supplied for that purpose only.

As stated in the Bribery Act 2012, there are four categories of offence which address the following:

- Offering, promising, or giving a bribe to another person
- Requesting, agreeing to receive, or accepting a bribe from another person
- Bribing a foreign public official
- A corporate offence of failing to prevent bribery.

This policy does form part of any employee's contract of employment, and it may be amended it at any time.

## Key Aims of this Policy

The key aims of this policy are:-

- To ensure that no bribery or corruption occurs within Scottish Gymnastics
- To ensure employees and board members understand the procedure to follow if they are concerned that bribery or corruption is happening within the company
- To ensure employees and board members understand the consequences of unacceptable behaviour regarding bribery or corruption
- To coincide with the Bribery Act 2012.

The policy is based on the following principles:

- Scottish Gymnastics is committed to providing a workplace free from bribery and corruption
- Under no circumstances should employees or board members accept or offer a reward in return for a favour
- Under no circumstances should a gift be offered or accepted without approval from employee's line manager or board chair.

## Receiving business gifts and hospitality

From time to time, customers, suppliers, or other persons might offer employees or board members a gift. This could be a small item, or something of considerable value. All gifts, however small, must be reported to line manager/ board chair and then the head of operations and recorded. If, in the opinion of Scottish Gymnastics, the value of the gift is too high (i.e. more than £25.00), the gift may not be accepted. If a gift is offered to an employee or board member and it's refused because of its value, this must be reported to the employee's line manager/ board chair.

Customers, suppliers, or other persons might invite you to a hospitality event from time to time. All such invitations must be reported to the employee's line manager / board chair and must receive permission from them before accepting any invitation.

A record of all gifts is held centrally by the head of operations which is available for inspection by appropriate parties at any time.

### **Offering business gifts and hospitality**

From time-to-time Scottish Gymnastics may offer small gifts (e.g. pens, water bottles) to customers, suppliers and other persons. If a gift is authorised, this can be given to the appropriate individuals. A record must be kept of all gifts.

Scottish Gymnastics occasionally runs hospitality events, primarily aimed at stakeholders. Employees or board members must not organise any additional hospitality events without seeking authority from their line manager/ board chair.

### **Donations to organisations**

Scottish Gymnastics may make donations to charity. These are managed by Scottish Gymnastics. Employees or board members should not make donations to a charity on Scottish Gymnastics behalf without approval of their line manager/ board chair.

No donations should be made to charities, political parties, or other organisations with the intention of gaining a business advantage.

### **Expenses**

All employee expense claims must be authorised by employee's line manager. They will check and sign all expense claims from you against receipts. Any items of expenditure that give rise to concern will be fully investigated. Please refer to the Business Travel and Expenses Policy for further information.

All board member expense claims must be authorised by head of operations. They will check and sign all expense claims from you against receipts. Any items of expenditure that give rise to concern will be fully investigated. Please refer to the Volunteer Expenses Policy for further information.

### **Unacceptable behaviour**

The following behaviour is unacceptable, and must not occur in Scottish Gymnastics;

- Requesting, agreeing to receive, or accepting any financial or other reward from any person in return for providing some favour
- Offering, promising, or giving a bribe of any financial or other reward to another person in return for providing some favour
- Bribing a national or international public official

- A corporate offence of failing to prevent bribery.

If an employee is found to have offered or accepted a bribe or offered or accepted a gift or hospitality without prior permission from their line manager, they may face disciplinary action in line with Scottish Gymnastics disciplinary policy which could result in their dismissal for gross misconduct.

If a board member is found to have offered or accepted a bribe or offered or accepted a gift or hospitality without prior permission from the board chair, they may face action in line with Scottish Gymnastics conduct in sport policy which could result in their removal from the board.

If, in Scottish Gymnastics' opinion, the act of bribery is serious then the case will be referred to the police. In line with the Bribery Act 2012 there is a maximum penalty of 10 years imprisonment for all of the above offences, other than the corporate offence, which carries an unlimited fine.

### **Raising concerns**

If employees or board members are concerned that they are being bribed, they should report this matter to their line manager/ board chair immediately.

If employees or board members are concerned that acts of bribery are occurring in Scottish Gymnastics, they should inform their line manager/ board chair in the first instance. If this course of action is inappropriate, they should inform another member of the senior leadership team.

If an employee's line manager is concerned about their actions, or the actions of a client or customer, they will speak to the chief executive officer or a member of the board for advice and will raise their concerns with the employee immediately.

### **Records**

A record of all gifts received and those distributed by Scottish Gymnastics are recorded in a register that is stored on SharePoint within staff information folder.

### Employee responsibilities

Employees and board members are responsible for informing their line manager/board chair of all gifts and hospitality that are offered and/or received by them to keep a record.

Employees and board members must ensure they are aware of this policy, and fully understand the rules in relation to the acceptance of gifts and hospitality within Scottish Gymnastics.