



West Warwickshire Sports Complex Anti-Bribery and Corruption

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West Warwickshire Sports Complex (WWSC) has a zero tolerance to bribery and corruption. The WWSC is committed to the prevention, deterrence and detection of fraud, bribery and/or any corrupt business practice.

WWSC requires staff including those employed on a temporary, agency or contractor basis at all times to:

- Act honestly and with integrity and to safeguard the Company resources for which they are responsible.
- Comply with the laws and regulations of all the UK.
- Respect the WWSC's customers, suppliers, and all other parties with whom it interacts by conducting business in an ethical, lawful and responsible conduct of business.

Legislation

The Fraud Act 2006 came into effect in January 2007. The Act introduced a new general offence of fraud which can be committed in three ways:

1. *Fraud by false representation, i.e.*, if he/she dishonestly makes a false representation and intends by making the representation to make a gain for him/herself or another, or to cause loss to another or expose another to risk of loss. A representation is false if it is untrue or misleading, and the person making it knows that it is, or might be, untrue or misleading;
2. *Fraud by failing to disclose information, i.e.*, if he/she dishonestly fails to disclose to another person information which he is under a legal duty to disclose and intends, by failing to disclose the information, to make a gain for himself or another, or to cause loss to another or expose another to risk of loss; and
3. *Fraud by abuse of position, i.e.*, if he/she occupies a position in which he/she is expected to safeguard, or not to act against, the financial interests of another person, and he/she dishonestly abuses that position, and intends by means of the abuse of that position, to make a gain for himself or another, or to cause loss to another or to expose another to a risk of loss.

Framework

We have an effective compliance programme that prohibits unethical conduct including:

- Communication of a code of conduct to all staff & members.
- Report and investigate all allegations of fraud, bribery, and other corrupt business practices.
- Apply disciplinary procedures for employees who are found to have engaged in such practices.
- Monitor and report to the Trustees on a regular basis the effectiveness of the controls in place.

The Policy

WWSC prohibits the offering, the giving, the solicitation, or the acceptance of any bribe, whether cash or other inducement to or from any person or company irrespective of where they are situated and whether they are a public official or body, private company, or individual person.

The responsibility to control the risks of unethical business practices occurring resides at all levels of WWSC.

We are committed to ensuring all employees are made aware of their personal responsibilities and ensuring they always adhere strictly to this policy.

We will provide information and additional guidance to any person with uncertainty regarding these requirements.

It is WWSC's policy that there will be consistent handling of all attempted, suspected, or proven fraud cases without regard to the position held or length of service of the individual(s) involved. This will very likely be immediate termination. Furthermore, all significant cases of such practices shall be reported to the public authorities.

This policy prohibits any inducement which results in a personal gain or advantage to the recipient, or any person or body associated with them, and which is intended to influence them to act which may not be solely in the interests of the WWSC or of the person or body employing them or whom they represent.

This policy is not meant to prohibit the following practices providing they are customary in the UK and are proportionate and are properly recorded:

- Normal and appropriate hospitality
- The giving of ceremonial gifts on a festival or at another special time
- The use of any recognised fast-track process which is available to all on payment of a fee
- The offer of resources to assist the person or body to make the decision more efficiently if they are supplied for that purpose.

Compliance

WWSC will review compliance against this policy statement on an annual basis.

Additions/amendments to this policy will be conducted through the approval of the Board of Directors.

Definitions

Fraud: Intentional misrepresentation or depriving someone of something by deceit, which might be straight theft, misuse of funds or other resources, or more complicated crimes such as the supply of false information or false accounting.

Bribe: To offer, give, solicit, or accept an inducement or reward that may influence the actions taken by the company.

Corruption: Illegal, dishonest, or fraudulent behaviour.

Deception: To obtain property or pecuniary advantage by deception.

Collusion: To incite, instigate, aid, and abet, or attempts to commit any of the crimes listed above.