

<b>Document Title</b>	SAA Anti-Corruption and Bribery Policy		
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# SCOTTISH ARCHERY ASSOCIATION

## ANTI-CORRUPTION AND BRIBERY POLICY

## **1 Introduction:**

Scottish Archery Association's attitude to Bribery and Corruption is to conduct all of our business in an honest and ethical manner which applies to all members and voluntary personnel when working on our business. We take a zero tolerance approach to any act of bribery and/or corruption and expect everybody to conduct themselves in a professional manner at all time when representing us

We are committed to implementing effective systems and procedures and enforcing them to counter bribery.

This Policy Applies:

- All members of Scottish Archery Association and any full time or part time staff, officials and volunteers
- or any other persons providing services to us

## **2 What is a Bribe:**

A bribe is a financial inducement or other advantage offered or given:

- To or from any person to persuade them to/or reward them for performing their duties improperly
- To or from any public official with the intention of influencing that or other official in performing their duties
- To or from World Archery or any member country of World Archery with the intention of influencing that or other official in performing their duties.

## **3 Gifts and Hospitality**

This policy does not prohibit giving and receiving promotional gifts of low value to a maximum of £50 Sterling and normal and appropriate hospitality.

However, in certain circumstances gifts and hospitality may amount to bribery and all persons mentioned above must comply strictly with SAA's appropriate policies in respect of gifts and hospitality.

We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence an official in the performance of his/hers duties.

## **4 Facilitation Payments and Kickbacks:**

We do not make and will not accept facilitation payments or “kickbacks” of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine action by any official. Kickbacks are typically payments made in return for a business favour or advantage.

All members must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

## **5 Donations:**

We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage.

## **6 Record Keeping:**

We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties.

All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our Financial Procedure policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off book” to facilitate or conceal improper payments.

## **7 Raising Concerns:**

All members and volunteers will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No person will suffer any detriment as a result of raising genuine concerns about bribery and corruption even if they turn out to be mistaken.

## **8 Monitoring:**

The effectiveness of this policy will be regularly reviewed by the Board.

## **9 Betting and Bribery:**

Any participant or SAA official shall :-

1. not place or attempt to place a bet on archery competitions or events in which he or his club participates or is organised under the auspices of SAA

2. not solicit or facilitate or attempt to solicit or facilitate, another person to bet on an archery competition or event in which he or his club participates or is organised under the auspices of SAA
3. not offer or attempt to offer a bribe in order to fix or contrive a result or the progress of a competition or event a competition or event in which he or his club participates or is organised under the auspices of SAA
4. report any approach or other activity which contravenes archery's rules on betting and co-operate with any investigation into suspected integrity issues in relation to bribery, corruption and betting.

#### **10 Duration**

This policy will remain in force for a period of 3 years from 11 September 2014

Prior to the end of the 3 year period, or earlier if required, this policy will be reviewed by the Director of Governance.