Anti-Fraud, Bribery and Corruption Policy

Approved: September 2026

Review Due: 2029

1. Introduction

It is important that we are aware of the risk of, and means of enforcing, the rules against fraud, bribery and corruption. This document sets out the Weightlifting Wales (WW) policy for detected or suspected fraud and incorporates best practice within the field regarding counter-fraud measures and takes account of the latest legislation.

This policy supplements the WW Whistle Blowing Policy.

2. Definitions

- ***Fraud*** is theft by deception. It is any deliberate intent to permanently deprive a person or organization of money or goods through the falsification of any records or documents.
- ***Bribery*** is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber
- ***Corruption*** is where someone is influenced by bribery, payment or benefit in kind to unreasonably use their position to give some advantage to another.
- ***Theft*** includes any misappropriation, stealing, malicious damage, and actual or attempted break-in.

WW already has procedures in place that reduce the likelihood of fraud, bribery or corruption occurring. These include appropriate policies, procedures, rules and regulations, a system of internal control and a system of risk assessment. In addition, WW tries to ensure that a risk (and fraud) awareness culture exists in the organisation.

Although, the WW Board holds primary responsibility for preventing fraud, bribery and/or corruption, it is recognised that all WW employees, members, volunteers and other individuals have a part to play in ensuring their efficacy. It is expected that WW employees at all levels will lead by example in acting with the utmost integrity and ensuring adherence to all relevant regulations, policies and procedures. A culture of openness, honesty and probity is strongly encouraged.

3. Objectives of Policy

WW is committed to maintaining an honest, open and well-intentioned atmosphere within the organisation. It is therefore also committed to the elimination of any fraud, bribery or corruption and to the rigorous investigation of any such cases.

WW expects anyone having any reasonable suspicions of fraud, bribery or corruption to report them. It recognises that whilst cases of theft are usually obvious, there may only be a suspicion of fraud, bribery or corruption and thus employees, volunteers, and members must report any concerns to the Chief Operating or other suitable persons, who can then ensure that WW procedures are followed.

It is also in this WW policy, which will be rigorously enforced, that no employee, volunteer, or member will suffer in any way as a result of reporting reasonably held suspicions. All employee, volunteers, and members can therefore be confident that they will not suffer in any way as a result of reporting, in good faith, reasonably held suspicions of fraud, bribery or corruption.

4. Roles and Responsibilities

This section states the roles and responsibilities of different individuals in reporting fraud, bribery or corruption.

4.1 Employees

Employees are expected to act in accordance with WW rules regarding Conflicts of Interest. Employees also have a duty to protect the assets of WW, including information and goodwill, as well as property.

WW policies, procedures, rules and regulations place an obligation on all employees to act in accordance with best practice.

4.2 Managers

Managers must be vigilant and ensure that procedures to guard against fraud, bribery and corruption are followed. Managers are expected to establish an anti-fraud culture within their team and ensure that information on procedures is made available to all their employees. They should identify the risk of fraud within their section and consider the adequacy of preventative controls.

Managers should be alert to the possibility that unusual events or transactions could be symptoms of fraud. Where they have any doubt, they must seek advice from the Chair of the Board.

All cases of theft whether of WW or visitor property, must be reported to the Chief Operating Officer, unless suspicion involves this person, in which case the Chair of Weightlifting Wales will be reported to. Similarly, any case of actual or suspected fraud or corruption must be reported to the appropriate person of authority (see section 5).

4.3 Members, Officers and Volunteers

Members and volunteers are subject to the same high standards of accountability as employees and are required to declare and register any interests that might potentially conflict with those of WW.

If any member, officer or volunteer of the WW has a financial, commercial, personal or other interest, either direct or indirect, in any contract, proposed contract or other matter, and is present at any meeting at which that contract or other matter is the subject of consideration, he or she is required, as soon as practicable after the meeting's commencement, to disclose the fact, and shall be prohibited from taking part in the consideration or discussion of the contract or other matter or to vote on any question with respect to it.

Interests such as the following shall be disclosed, although the list is not exhaustive:

- any employment or income received from work undertaken within weightlifting
- any income received from WW as a partner, director or employee within a firm;
- any sponsorship personally received;
- any sponsorship given to any aspect of weightlifting;
- any contracts with WW for the provision of services or goods for profit;
- any interests in any corporate bodies which do business with the WW

Any interest which any close members of the family of the member, officer or volunteer may have in these matters shall also be declared when matters or issues are discussed which could affect their financial position

For the record, and for openness and scrutiny, a Register of Interests shall be maintained, in which the interests of those persons referred to in this section shall be declared in writing. Written disclosures shall be entered in the Register, which shall be maintained by the Chief Operating Officer & Head of Governance and Compliance.

5. Reporting Fraud, Bribery or Corruption

This section outlines the action to be taken where fraud, corruption or other illegal acts involving dishonesty, are discovered or suspected. Reporting of all frauds and irregularities is essential to ensure:

- consistent treatment of information;
- proper investigation by an independent and experienced team;
- the optimum protection of WW interests.

Any actual or suspected instance of fraud or corruption must be reported to the appropriate person of authority immediately (see section 6), with copies of any documents which are relevant. It is essential that individuals act at the time of their concerns, as time is likely to be of the utmost importance to prevent further loss to WW. However, individuals must not confront any individual that they suspect directly, nor must they contact the police directly.

If an employee suspects their line manager of fraud, bribery, or corruption, the employee should report the suspicions to the Chair of Weightlifting Wales. If the suspicion involves a board director, the matter will be reported to the Chair of Weightlifting Wales or the Sport Wales Relationship Manager if appropriate. If the Chair of Weightlifting Wales is suspected, then the report should be made to the Sport Wales Relationship Manager (See page 9).

6. Police Involvement

Where financial impropriety is discovered, WW expectation is that the police will be involved. Any referral to the police will not prohibit action being taken under WW Disciplinary Policy or Procedure.

7. Unfounded Allegations

All staff and members of WW receive statutory protection (Public Interest Disclosure Act 1998) where they have disclosed information ‘reasonably and responsibly in the public interest’. Anyone raising genuine concerns which, following investigation prove unfounded, will be informed of the outcome. Any employee who knowingly discloses false/misleading information or makes malicious allegations, will not be protected by statutory provisions and will be subject to investigation and disciplinary action as appropriate.

8. Warning Signs

Whilst by no means being proof on their own, the circumstances below may indicate fraud, and should therefore raise suspicions:

- altered documents (correcting fluid, different pen or handwriting);
- claim form details not readily checkable;
- changes in normal patterns, e.g. of cash takings or travel claim details;
- text erratic or difficult to read or with details missing;

- delay in completion or submission of claim forms;
- lack of vouchers or receipts in support of expense claims, etc;
- employees seemingly living beyond their means;
- employees under constant financial or other stress;
- employees choosing not to take annual leave (and so preventing others becoming involved in their work), especially if solely responsible for a 'risk' area;
- complaints from the public or from employees;
- insistence on dealing with a particular individual

It is an offence under the Bribery Act 2010 for you to corruptly accept any gift or consideration as an inducement or reward for doing, or refraining from doing, anything in your official capacity, or showing favour or disfavour to any person in your official capacity.

Furthermore, under the Prevention of Corruption Act, any money, gift or consideration received by an WW employee from a person or organisation holding, or seeking to obtain, a contract with WW, will be deemed to have been received corruptly unless you prove to the contrary. It is therefore essential for WW employee's to declare any gifts or considerations received to Chief Operating Officer and to obtain written approval for the retention of the gift.

9. <u>Revision of Policy</u>

WW reserves the right to amend and/or withdraw this policy from time to time for any reason, including without limitation, to take account of changes in the law, best practice and/or operational requirements.

<u>Line of Reference for Reporting concerns:</u>