



Anti Bribery Policy

Board approved and accepted 28 November 2013

Version 1

Anti-Bribery Policy

Bribery is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber. The purpose of this policy is to set out guidelines that must be adhered to by The Board of Directors and Employees in **West Dunbartonshire Leisure** to ensure that no bribery occurs. This policy supplements the Staff Code of Conduct.

1. Unacceptable Behaviour

The following behaviour is unacceptable, and must not occur in this organisation:

- **accepting** any financial or other reward from any person in return for providing some favour;
- **requesting** a financial or other reward from any person in return for providing some favour;
- **offering** any financial or other reward from any person in return for providing some favour.

2. Business Gifts

From time to time, customers or suppliers might offer a gift to an employee or Director. This could be a small item, or something of considerable value. Any gifts above the value of £10 should be reported to the Company Secretary and recorded on the gift / hospitality register. No gifts with a value of more than £50 may be accepted. If a gift is offered and then refused because of its value, this also must be reported to the Company Secretary.

3. Hospitality

From time to time, customers, suppliers or other persons might invite an employee or Director to a hospitality event. All such invitations must be reported to the General Manager. Permission must be given by the General Manager before an employee accepts and registers any such invitation; Directors should inform the Board Chair in advance of accepting any such invitation and should ensure the acceptance is registered.

4. Offering Gifts and Hospitality

It is West Dunbartonshire Leisure's custom from time to time to offer small gifts (e.g. branded pens, lapel badges, lanyards) to customers and partners as a marketing tool and good will gesture. The Business Development Officer has the responsibility for any stock of such branded marketing gifts and for monitoring their distribution.

The company may occasionally run hospitality events or meetings including hospitality. An employee must not organise any additional hospitality event without seeking authority from the General Manager.

5. Responsibilities of the General Manager and Company Secretary

The General Manager is responsible for authorising any hospitality accepted or offered (other than teas/coffees at meetings) by WDL employees and for ensuring the Management Team is fully aware of this policy. The Company Secretary is responsible for ensuring a record is kept of all gifts and hospitality offered and/or received b

employees. If Managers are concerned about any actions, they should contact the General Manager for advice.

The Managers within the West Dunbartonshire Leisure Management Team are responsible for ensuring that their direct line employees are aware of this policy and fully understand the rules in relation to the acceptance of gifts and hospitality.

6. Expenses

Managers must authorise all expense claims by checking and signing all claims against receipts. Any items of expenditure that give rise to concern should be reported to the General Manager.

7. Attempts to Bribe

Any employee or Director who is concerned that he or she is potentially being bribed should report this matter to the General Manager or Board Chair respectively immediately.

8. Disciplinary Action

Any employee found to have offered or accepted a bribe may face disciplinary action which could include dismissal for Gross Misconduct. A Director who is found to have offered or accepted a bribe may face removal from the board.

9. Raising Concerns

If an employee is concerned that acts of bribery are occurring within the WDL, they should inform their Line Manager in the first instance. If this course of action is considered inappropriate, the employee should inform the General Manager. A Director should raise any concerns with the Chair of the board.