

12.2 Welsh Athletics is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Head of Operations immediately. If the matter is not remedied, and you are an employee, you should raise a formal grievance through Human Resources.

13. Training and communication

13.1 Training on this policy forms part of the induction process for all new workers. All existing workers will receive training on how to implement and adhere to this policy.

13.2 Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

14. Who is responsible for the policy?

14.1 The Chief Executive Officer has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

14.2 The Head of Operations has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Members are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.


15. Monitoring and review


15.1 The Head of Operations will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.


15.2 All workers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.


This policy is not intended to be binding. Welsh Athletics Ltd 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.

Welsh Athletics Equality Impact Assessment Form


	Name of Policy	Anti-Bribery Policy	
	Is this a new policy being developed or a review of an existing policy	New <input type="checkbox"/>	Review <input checked="" type="checkbox"/>
	Others involved in the assessment	Head of Operations, Board of Directors, Equality Lead	
	Dates(s) of EIA	13/09/2016	
	What is the purpose and outcomes of the policy?	This policy provides guidance to all employees and volunteers on how to recognise and deal with bribery and corruption issues.	
	Who are the customers for this policy?	All Welsh Athletics employees, workers and volunteers	
	How has equality been considered in the development / review of the policy so far?	<ul style="list-style-type: none"> The policy is equally applicable to everyone and is accessible to all being stored both on the staff intranet and the Welsh Athletics website. The policy will be translated into Welsh 	
	Who / what has driven this?	<ul style="list-style-type: none"> The policy has been created in response to the Anti-Bribery Act 2010 The need to protect the organisation and its employees from exposure to bribery and corruption 	
	Why might it be important to consider equality and the protected characteristics?	<p>To ensure that the process is robust enough to guarantee fair application of the policy to any individual that raises a concern.</p> <p>The policy covers preventing and dealing with cases of bribery and corruption and there is no element of the policy identified which could have an adverse impact on any of these groups. All cases of bribery and corruption will be dealt with in accordance with the policy.</p>	


 <p>Data and research</p>	What does the data tell you about your customers and about protected equality groups?	<ul style="list-style-type: none"> • Policy translation into Welsh supports the Welsh Language Action Plan which is an element of the Equality Action Plan. • There is currently no available equality data on anti bribery and corruption matters available to analyse. • No negative impact on any groups has been identified as there is no differing application of the policy according to any persons protected characteristic.
	What sources of data have you used?	
	What do you need to know more about?	
	How could you find this out and who could help you?	

 <p>Consultation</p>	Who have you consulted with from protected equality groups?	No consultation has taken place on review of this existing policy.
	Who else could you consult with?	
	Who can help you with this?	

 <p>NGB equality objectives</p>	How does the policy contribute to the NGBs strategic equality objectives?	<ul style="list-style-type: none"> • The Equality Action Plan requires that all new and reviewed policies undergo an Equality Impact Assessment (EIA) for consideration of the effects of a policy on under-represented groups. This review and EIA contributes to upholding WA commitment to its Equality objectives. • This policy is applicable and will be available to all staff and volunteers on the staff intranet and WA website.
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		<ul style="list-style-type: none"> Policy translation into Welsh supports the Welsh Language Action Plan which is an element of the Equality Action Plan.
	How could it be revised or changed to contribute more?	No change required

 <p>Monitor and evaluate</p>	How will you monitor and evaluate the policy?	<ul style="list-style-type: none"> The policy will be reviewed no less than 1 year and a maximum of 3 years to take account of changes in the law, best practice and/or operational requirements. An EIA will be carried out the results will be logged, publicised on the website and reported to the Board of Directors.
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 <p>Outcomes of impact assessment</p>	Action	Timescale	Responsibility
	Record any bribery and corruption concerns raised, and where possible, the equality data of persons making the report for future analysis on impact of the policy	Ongoing	Chief Executive Officer
	Distribute the reviewed policy to the staff team and volunteers	November 2016	Head of Operations
	Carry out policy review and EIA in August 2018	Aug 2018	Head of Operations

	Signed by the Board of Directors	Board meeting	Date	26 Sept 2016
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	Signed by Policy Lead	James Williams	Date	26 Sept 2016
	Signed by EIA Lead Officer	Sarah Williams	Date	26 Sept 2016