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

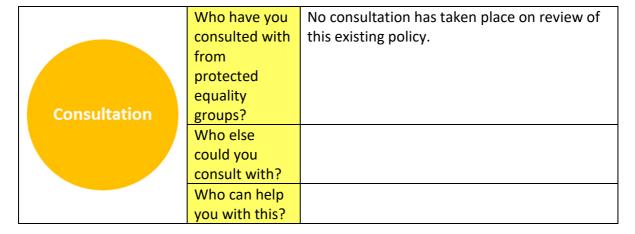
- 15.1 The Head of Operations will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular 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.

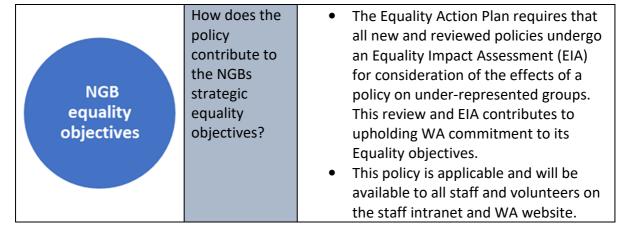
This policy is not intended to be binding. Welsh Athletics Ltd reserves the right to amend and/or withdraw this policy from time to time for any reason, including without limitation, to take account of changes in the law, best practice and/or operational requirements.

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 □	Review	
	Others involved in the assessment Dates(s) of EIA	Head of Operations, Board of Directors, Equality Lead 13/09/2016		
Development or review of a policy	What is the purpose and outcomes of the policy? Who are the customers for this policy? How has equality been considered in the development / review of the	This policy provides guidance to all employees and volunteers on how to recognise and deal with bribery and corruption issues. All Welsh Athletics employees, workers and volunteers • The policy is equally applicable to everyone and is accessible to all bein stored both on the staff intranet and the Welsh Athletics website. • The policy will be translated into Welsh		
	policy so far? Who / what has driven this?	 The policy has been created in response to the Anti-Bribery Act 201 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?	To ensure that the process is robust enoug to guarantee fair application of the policy t any individual that raises a concern. The policy covers preventing and dealing with cases of bribery an corruption and the 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.		

Data and research	What does the data tell you about your customers and about protected equality groups?	 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 characterisitic.
	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?	





	 Policy translation into Welsh supports the Welsh Language Action Plan which is an element of the Equality Action Plan.
How could it	No change required
be revised or	
changed to	
contribute	
more?	

Monitor and evaluate

How will you monitor and evaluate the policy?

Action

- 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.

Timescale Responsibility

Outcomes of impact assessment

ACTION	Timescale	Responsibility
Record any bribery and corruption	Ongoing	Chief
concerns raised, and where		Executive
possible, the equality data of		Officer
persons making the report for		
future analysis on impact of the		
policy		
Distribute the reviewed policy to	November	Head of
the staff team and volunteers	2016	Operations
Carry out policy review and EIA in	Aug 2018	Head of
August 2018		Operations

Signed by the Board of	Board	Date	26 Sept
Directors	meeting		2016

Signed by Policy Lead	James Williams	Date	26 Sept 2016
Signed by EIA Lead Officer	Sarah Williams	Date	26 Sept 2016