



# **Watford Football Club's Community Sports and Education Trust**

## **Anti-Corruption and Bribery Policy**

## About this Policy

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

This policy does not form part of any employee's contract of employment and we may amend it at any time. It will be reviewed regularly.

## Who must comply with this Policy?

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, trustees, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

## What is Bribery?

**Bribe** means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

**Bribery** includes offering, promising, giving, accepting or seeking a bribe.

All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your manager.

Specifically, you must not:

- give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- accept any offer from a third party that you know, or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
- give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;
- You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

## **Gifts and Hospitality**

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.

Please refer to the Trust Receipt of Business Gifts and Hospitality Policy for further information.

## **How to raise a concern**

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your manager as soon as possible.

## **Equal Opportunities**

The Watford FC Community Sports & Education Trust is committed to being a fair employer and involver of volunteers and a fair service provider. We want a workplace and volunteering environment where everybody has equality of opportunity and we want equality of treatment for those we provide services and support to, or otherwise encounter.

Promoting equality and diversity is an essential part of our mission and values and key to our effectiveness.

Our diversity vision is that we should 'act inclusively, upholding equality law, treating everyone fairly and seeking to provide a culture which delivers the best outcomes for the diverse society in which we operate'

Our Equality and Inclusion policy aims to promote equality and diversity, ensuring that delivery of our objectives and the demonstration of expected behaviour is the responsibility of all staff, trustees and volunteers within the Trust.

Policy Name	Anti-Corruption and Bribery Policy
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