



# ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

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# CIMSPA's Views on Anti-Bribery and Anti-Corruption

CIMSPA is committed to conducting 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.

## Who Should Comply?

This policy applies to all permanent and fixed-term team members employed by CIMSPA, and any contractors, consultants, Trustees, Committee Members, or other persons acting under or on behalf of CIMSPA.

## Policy Aim

The aim of this policy is to help CIMSPA act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise individuals of the Company's 'zero-tolerance' to bribery.

## The Law

Under UK law (UK Bribery Act 2010), bribery and corruption are punishable for individuals by up to ten years' imprisonment. If CIMSPA is found to have taken part in the corruption or lacks adequate procedures to prevent Bribery, it could face an unlimited fine and be excluded from tendering for Government contracts.

## What is Bribery?

A "Bribe" is a financial or other advantage offered or given to anyone to encourage that person to perform their functions or activities improperly or to reward that person for having already done so. Acting improperly includes actions which are, unethical, a breach of trust, or improper in any other way. Bribes may take the form of money, gifts, kickbacks, loans,



fees, services, discounts, the awarding of a contract, or any other commercial or personal advantage or benefit. “Bribery” includes offering, promising, giving, accepting, or seeking a bribe.

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 (even if these payments are common in certain countries); or
- 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.

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality (including meals, drinks, or other activities) for legitimate purposes such as building relationships, maintain our image or reputation, or marketing our services.

Our Declaration of Gifts and Hospitality Policy can be referenced for more detailed information.

## Policy Statement

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

CIMSPA will not:

1. Make contributions of any kind with the purpose of gaining any commercial advantage.
2. Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
3. Offer, make, or accept, “kickbacks” or bribery of any kind.

CIMSPA will:

1. Keep appropriate internal records that will evidence the business reason for awarding any payments or other benefits to third parties.
2. Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
3. See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.



# Employee Responsibility

CIMSPA's people must not:

1. Accept any financial or other reward from any person in return for providing some favour.
2. Request a financial or other reward from any person in return for providing some favour.
3. Offer any financial or other reward from any person in return for providing some favour.

## Non-Compliance

### Team Members

Failing to observe CIMSPA's Anti-Bribery and Anti-Corruption Policy may lead to disciplinary action in accordance with CIMSPA's Disciplinary Policy.

### Volunteers, Contractors and Consultants

In the event of a breach of this policy by other organisations, or individuals, CIMSPA will take appropriate action.

## Monitoring Policy

The policy will be monitored on an on-going basis to ensure that it addresses issues effectively.

The following will be monitored:

1. That all individuals working for CIMSPA are advised of the policy.
2. Assessment of any reported incident or related occurrence.
3. The maintenance of a CIMSPA Gifts and Hospitality Register through updates from each department.
4. Monitoring of the policy is essential to assess how effective CIMSPA has been in carrying out its obligations.

## Definitions



**Bribe** is a financial or other advantage offered or given to anyone to encourage that person to perform their functions or activities improperly or to reward that person for having already done so. Acting improperly includes actions which are illegal, unethical, a breach of trust, or improper in any other way. Bribes may take the form of money, gifts, kickbacks, loans, fees, services, discounts, the awarding of a contract, or any other commercial or personal advantage or benefit.

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

**Corruption** is a form of dishonest or criminal behaviour undertaken by a person entrusted with authority, to acquire illicit benefit or to abuse their power for their own private gain.

**Hospitality** is the practice of being hospitable, this includes the reception and entertainment of guests / visitors.

**Kickbacks** or facilitation payments are typically small payments made in return for a business favour or advantage.

## How and When to Notify in Case of Non-Compliance

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 in the future, you must notify your manager or the Chief Operating Officer as soon as possible.

You are encouraged to raise concerns about any issue or suspicion of bribery in any parts of our organisation or supply chains at the earliest possible stage.

If you are unsure about whether a particular act constitutes any of the various forms of bribery, raise it with your manager or the Chief Operating Officer.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that bribery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. 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 HR team immediately. If the matter is not remedied, and you are an employee, you should raise it formally with your Manager or the Head of People and Culture.

## Reviewing Policy



This policy will be reviewed annually and, if necessary, revised in the light of legislative or organisational changes. Improvements will be made by learning from experience and the use of an established annual review.

# Policy Amendments

Should any amendments, revisions, or updates be made to this policy it is the responsibility of the Chief Executive to see that all relevant employees receive notice and training if necessary.

Revised by	Date of Revision	Review Date
Chief Operating Officer – Kay Simnett	February 2024	February 2025





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