Anti-Fraud, Bribery and Corruption Policy

BowlsWales · BowlsCymru

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Approved by	BowlsWales Board
Owner	General Manager

BowlsWales | Sport Wales National Centre, Sophia Gardens, Cardiff, CF11 9SW
enquiries@bowlswales.com | +44 (0)29 2033 4998 | bowlswales.com

Introduction

This policy sets out BowlsWales's approach to fraud, bribery and corruption. It incorporates best practice in counter-fraud measures and takes account of current legislation, including the Bribery Act 2010 and the Fraud Act 2006.

This policy supplements the BowlsWales Whistleblowing Policy.

Definitions

Fraud — theft by deception. Any deliberate intent to permanently deprive a person or organisation of money or goods through the falsification of records or documents.

Bribery — accepting gifts, money, hospitality or other favours in return for providing something of value to the briber.

Corruption — being influenced by bribery or benefit in kind to unreasonably use a position to give an advantage to another.

Theft — includes any misappropriation, stealing, malicious damage, and actual or attempted break-in.

BowlsWales Policy

BowlsWales is committed to maintaining an honest, open and well-intentioned organisation. It is committed to the elimination of any fraud, bribery or corruption and to the rigorous investigation of any such cases.

BowlsWales expects anyone with reasonable suspicions of fraud, bribery or corruption to report them promptly. It is policy, which will be rigorously enforced, that no employee will suffer in any way as a result of reporting reasonably held suspicions in good faith.

Roles and Responsibilities

Employees

Employees are expected to act in accordance with BowlsWales's Conflicts of Interest policy and have a duty to protect the assets of BowlsWales, including information and goodwill as well as property.

General Manager and Chair

The General Manager and Chair must be vigilant to the possibility that unusual events or transactions could be symptoms of fraud. They should establish an anti-fraud culture and ensure information on procedures is available to all employees.

All cases of theft must be reported to the General Manager. Cases of actual or suspected fraud or corruption must be reported to the Chair of the Board. If either individual is unavailable or implicated, report to another appropriate Board member. Contact details are available on the BowlsWales website.

Members, officers and volunteers

Members and volunteers are subject to the same high standards as employees and are required to declare any interests that might conflict with those of BowlsWales.

Any member, officer or volunteer with a financial, commercial, personal or other interest — direct or indirect — in any contract or matter being considered at a meeting must disclose that interest as soon as practicable after the meeting commences.

Interests that must be disclosed include, but are not limited to:

- Any employment or income received from work undertaken within bowls.
- Any income received from BowlsWales as a partner, director or employee.
- Any sponsorship personally received or given to any aspect of bowls.
- Any contracts with BowlsWales for the provision of services or goods for profit.
- Any interests in corporate bodies that do business with BowlsWales.

Interests of close family members in these matters must also be declared where relevant. A Register of Interests will be maintained by the General Manager.

Reporting Fraud, Bribery or Corruption

Any actual or suspected instance of fraud or corruption must be reported to the Chair immediately, with copies of any relevant documents. If the Chair is unavailable or implicated, report to another appropriate Board member.

Individuals must not confront a suspected person directly, nor contact the police directly — this is for BowlsWales to coordinate. Time is of the essence: prompt reporting helps prevent further loss.

Police Involvement

Where financial impropriety is discovered, BowlsWales expects the police will be involved. A referral to the police does not prohibit action being taken under the BowlsWales Disciplinary Policy.

Unfounded Allegations

Staff receive statutory protection under the Public Interest Disclosure Act 1998 where they have disclosed information reasonably and responsibly in the public interest. Staff raising genuine concerns that prove unfounded will be informed of the outcome.

Any employee who knowingly discloses false or misleading information, or makes malicious allegations, will not be protected by statutory provisions and will be subject to investigation and potential disciplinary action.

Warning Signs

The following circumstances may indicate fraud and should raise suspicions, though they are not proof on their own:

- Altered documents — correcting fluid, different pen or handwriting.
- Claim form details that are not readily checkable.
- Changes in normal patterns of cash takings or travel claim details.
- Erratic or incomplete documentation.
- Delay in completion or submission of claim forms.
- Lack of vouchers or receipts in support of expense claims.
- Employees seemingly living beyond their means.
- Employees under constant financial or other stress.
- Employees choosing never to take annual leave, particularly if solely responsible for a risk area.
- Complaints from the public or employees.

- Insistence on dealing with a particular individual.

It is an offence under the Bribery Act 2010 to corruptly accept any gift or consideration as an inducement or reward for anything done in an official capacity. Any gift or consideration received from a person or organisation holding or seeking a contract with BowlsWales must be declared to the Chair and written approval obtained for its retention.

Revision of Policy

BowlsWales reserves the right to amend and/or withdraw this policy from time to time, including to take account of changes in the law, best practice and operational requirements.

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