

Disability Sport Fife (SCIO)



Compliance and Ethics Policies and Procedures

Updated and Approved by
DSF(SCIO) Board of Charity Trustees February 2021

Contents

1.0	Anti-Doping Policy	4
1.1	Our Anti-Doping Policy	4
1.2	The Therapeutic Use Exemption (TUE)	5
2.0	Anti-Corruption (Sports Betting) Policy	6
2.1	Introduction	6
2.2	Sporting Integrity	6
2.3	Criminal Offence of Cheating - section 42 of the Gambling Act 2005	7
2.4	“Inside Information”	7
2.5	Betting Integrity Officer - Roles and Responsibilities	8
2.6	Response Plan	8
2.7	Compliance	10
2.8	Appendix A: Scottish Governing Bodies and Sporting Organisations Sporting Integrity – Guidance Note	11
	6 Step Action Plan	12
2.9	Appendix B - Section 42 – Gambling Act 2005	16
3.0	Anti-Corruption & Bribery Policy	17
3.1	About this Policy	17
3.2	What is Bribery?	17
3.3	Gifts	17
3.4	Hospitality	18
3.5	Record-keeping	18
3.6	How to raise a concern	18
4.0	Purchasing & Procurement Policy	19
4.1	Introduction	19
4.2	Principles	19
4.3	Disability Sport Fife (SCIO) Policy	19
4.4	Roles and Responsibilities	19
4.5	Goods and Services	20
4.6	Estimated Value of Order	20
4.7	Document Retention	21
5.0	Conflicts of Interest Policy	22
5.1	Why we have a policy	22
5.2	The Declaration of Interests	22
5.3	Register of Interests	23
5.4	Data Protection	23
5.5	What to do if you face a Conflict of Interest	23

5.6	Decisions taken where a Trustee or Member of Staff has an interest.....	23
5.7	Managing Contracts	24
5.8	Conflict Summary Register.....	24
5.9	Appendix A:	25
5.10	Appendix B:	26
6.0	Public Interest Disclosure (Whistleblowing) Policy.....	27
6.1	Purpose	27
6.2	Background.....	27
6.3	What Should be Disclosed?	27
6.4	Complaints Procedure.....	28
6.4.1	Informal Steps.....	28
6.4.2	Formal Steps	28
6.4.3	Appeal	29
6.4.4	Protection from Detriment	29
6.5	External Authorities	29
7.0	Codes of Conduct	30
7.1	Disability Sport Fife (SCIO) - Athlete/ Coaches/ Volunteer Code of Conduct	30
7.2	Disability Sport Fife (SCIO) – Parents Code of Conduct	31
7.3	Code of Conduct for Members of the Disability Sport Fife Board of Charity Trustees....	32
7.3.1	Introduction	32
7.3.2	Implementation	32
7.3.3	Responsibilities.....	32
7.3.4	Code of Conduct.....	33
7.3.5	Declaration	33
7.3.6	Register of Interests.....	34
8.0	Ethics Statement	35
9.0	Sponsorship Policy.....	36
9.1	Introduction	36
9.2	Definition of Sponsorship	36
9.3	Exclusions.....	36
9.4	Advantages of Sponsorship.....	36
9.5	Risk Associated with Sponsorship.....	37
9.6	Aims.....	37
9.7	Scope	37
9.8	Activation	38
9.9	Cancellation	38
9.10	The Sponsorship Process and Associated Roles and Responsibilities	38

9.11 Guidelines.....38
Appendix A.....40
10 Disability Sport Fife (SCIO) Contact Details41

1.0 Anti-Doping Policy

Disability Sport Fife (SCIO) – Anti-Doping Policy

1.1 Our Anti-Doping Policy

Disability Sport Fife (DSF) is committed to protecting the fundamental rights of athletes to participate in drug-free sport and in doing so promote health and well-being and fairness for athletes and players competing in disability sport in Fife and Scotland. All athletes have the right to compete in sport knowing that they, and their competitors are clean. The use of performance-enhancing drugs and other doping behaviour severely damages the legitimacy of sport and undermines the integrity of clean athletes.

Disability Sport Fife’s anti-doping policy adopts the UK Anti-Doping Rules published by UK Anti-Doping (or its successor), as amended from time to time. Such rules shall take effect and be construed as the rules of Disability Sport Fife. The Disability Sport Fife policy is consistent with the World Anti-Doping Code (2015 Code), which governs anti-doping internationally.

Disability Sport Fife’s parent body Scottish Disability Sport (SDS) is a member of Cerebral Palsy International and Recreation Association (CPISRA), International Federation Cerebral Palsy Football (IFCPF), United Kingdom Boccia Federation (UKBF) and the International Bowls for the Disabled (IBD). Furthermore, they are an associate member of Boccia International Sports Federation (BisFed). As such all branches, athletes, coaches, significant others and volunteers associated with SDS must abide by the UK Anti-Doping Rules.

You can find the UK Anti-Doping Rules here <https://www.ukad.org.uk/about/anti-doping-rules>

DSF commits to adopt and implement updates to UK Anti-Doping rules as published by UK Anti-Doping (or its successor)

“100% me” is UK Anti-Doping’s athlete-centred programme which aims to increase understanding of drug-free sport amongst the whole sporting community through providing high quality, relevant information on anti-doping and promoting the positive attitudes and values of sportsmen and women in the UK who have competed successfully in sport drug-free.

Sport is about competing and performing to the very best of your ability. If athletes have to use prohibited substances or methods to improve their performance, they are cheating themselves and their fellow athletes.

- 100% Belief
- 100% Determination
- 100% Dedication
- 100% Respect
- 100% Commitment
- 100% Knowledge

These are the attributes of world class sportsmen and women who commit themselves to drug-free sport. Athletes with these qualities know what it is like to win without drugs because they have confidence in themselves and their preparation for an event.

The “100% me” message will be delivered to Disability Sport Fife athletes and athlete support personnel within the DSF Anti-Doping education strategy.

1.2 The Therapeutic Use Exemption (TUE)

A means by which an athlete can obtain approval to use a prescribed prohibited substance or method for the treatment of a legitimate medical condition. Athletes should advise all medical personnel of their obligation to abide by the anti-doping rules of their sport and that any medical treatment received must not violate these rules.

When prescribed a substance or method, athletes should find out whether the medication is prohibited by checking the Global DRO (<https://www.globaldro.com/Home>). If the medication is not prohibited, athletes can start using the prescribed medication or treatment.

There are specific requirements for when an athlete needs to apply for a TUE depending on their competition level. International athletes (as defined by their International Federation) should submit TUE applications to their International Federation.

For more information on Anti-Doping procedures contact DSF Chairman, Richard Brickley at richard.brickley@fife.gov.uk

For more information athletes should visit:

- World Anti-Doping Agency <http://www.wada-ama.org/en/>
- UK Anti-Doping <https://www.ukad.org.uk/>
- 100% me <https://www.ukad.org.uk/athletes/100-me>
- Global DRO <https://www.globaldro.com/UK/search>
- Informed-Sport <https://www.informed-sport.com/>
- Prohibited List <https://www.wada-ama.org/en/content/what-is-prohibited>

2.0 Anti-Corruption (Sports Betting) Policy

2.1 Introduction

- 2.1.1 All DSF staff and session coaches have a contractual obligation to maintain the highest standards of integrity by carrying out their work in a way that will not compromise the reputation of the organisation.
- 2.1.2 This policy sets out DSF's standards and procedures relating to Anti-Corruption (Sports Betting) and applies to all individuals working for and representing DSF which includes DSF Board of Charity Trustees and all employees, volunteers, contractors, consultants and/or related personnel of DSF acting in any capacity or activity sanctioned by DSF as determined by the Board of Charity Trustees in writing (referred to collectively as "Staff").
- 2.1.3 The framework for this policy is based on the Scottish Governing Bodies and Sporting Organisations Sporting Integrity – Guidance Note (Appendix A)
- 2.1.4 The purpose of this policy is to provide an overview and general advice to all the above people on the issues associated with the integrity of sports betting.
- 2.1.5 This Toolkit is intended to protect the reputation of sport, DSF and each individual acting for it. Please note that the responsibility for complying with this policy lies with all those to whom it applies.

2.2 Sporting Integrity

- 2.2.1 A core function of DSF is to maintain and be seen to be maintaining the integrity of disability sport in Fife.
- 2.2.2 DSF must take action to protect itself from the threats posed to its integrity by corrupt betting and associated activity both from within and outside the organisation. As sports betting activity has increased across all sports and disciplines, it is essential that such activity does not take place in a manner which has the potential to compromise sporting conduct and endeavour.
- 2.2.3 There will be stricter rules for members of Staff in positions of trust and/or at particular risk and this will depend on the role of the Staff member.
- 2.2.4 If you are "Directly Involved" with a sport you cannot:
- bet on the sport, anywhere in the world;
 - ask someone to bet on your behalf on the sport anywhere in the world;
 - share any "Inside Information" with anyone including but not limited to your spouse, cohabitee or dependent children which could enable them to gain an advantage through corrupt betting activity (See section 4 (Inside Information) for further information); and

- become involved in any other activity associated with corrupt betting which could reasonably be deemed as suspicious and detrimental to the image and reputation of DSF and the sport.

2.2.5 “Directly Involved” means working with a sport as a representative of DSF.

2.2.6 The following offences are also prohibited:

- fixing a match or attempting to fix a match;
- benefiting from failing to perform;
- soliciting, inducing, encouraging, offering a bribe (or attempting to) any other party to do any of the above offences;
- receiving, seeking a bribe (or attempting to) in order to fix a match or attempt to fix a match;
- posing a threat to the integrity of the sport;
- destruction of evidence in relation to a potential breach; and
- failing to report suspicions or approaches.

2.3 Criminal Offence of Cheating - section 42 of the Gambling Act 2005

2.3.1 Section 42 of The Gambling Act 2005 has created a new offence of “cheating at gambling” which would include cheating in sports influenced by betting involvement (see the extract of section 42 of the Gambling Act 2005 in Appendix B).

2.3.2 Breach of the Gambling Act 2005 new rules may result in the imposition of severe penalties for individuals.

2.3.3 Depending on the nature of the activity, DSF’s Investigation Panel (see section 2.6.5-2.6.12) may refer the matter to the Gambling Commission for consideration of an investigation of the criminal offence of cheating at gambling.

2.4 “Inside Information”

2.4.1 The sharing of “Inside Information” by anyone captured by this policy is specifically prohibited by DSF.

“Inside Information” means any information, which is not “Publicly Known” that would materially affect peoples’ expectations relating to the participation in, or the likely or actual outcome of a sporting competition or event. Such information includes but is not limited to factual information regarding the competitors, the conditions, tactical considerations, injuries, or any other aspect of the sporting competition or event.

“Publicly Known” means any information that is already published as a matter of public record, able to be readily acquired by an interested member of the public or disclosed according to the rules and regulations governing the relevant sporting competition or event.

2.4.2 With regard to your responsibilities under 2.2.4, it is your responsibility to determine whether information which you have access to falls under the definition of “Inside information”. You are advised to err on the side of caution. You should also seek advice from the DSF Chairman.

2.5 Betting Integrity Officer - Roles and Responsibilities

2.5.1 The DSF (SCIO) Chairman or his proposed nominee is the DSF designated Betting Integrity Officer.

2.5.2 All DSF staff session coaches are responsible for betting integrity issues, but the Betting Integrity Officer has specific additional responsibilities including:

- establishing and maintaining a sound Sports Betting Policy that supports the achievement of DSF policies, aims and objectives; and
- advising the Investigations Panel (see section 2.6 below).

2.6 Response Plan

2.6.1 It is vital that, if there is any suspicious betting activity within DSF, action is taken.

2.6.2 All Staff should be aware that they must not try to deal with or investigate any allegations of corrupt betting and associated activity by themselves but should immediately report the matter to the DSF Chairman.

2.6.3 All Staff must report any approach or activity which contravenes, or which may contravene, DSF’s rules on sports betting. Specifically,

- if any member of Staff is approached about fixing any part of a match or asks for “Inside Information” then he/she must report this and cannot just ignore it;
- if any member of Staff has any concerns about any other member of Staff’s activity then he/she must report this; and
- any threats should always be reported.

2.6.4 In the event that a member of Staff is concerned that the DSF Chairman is involved in suspicious betting activity outlined in section 2.6.3 above, this should be reported to the DSF Honorary Treasurer.

2.6.5 All Staff must co-operate with any investigation and/or request for information including the provision of documentation (e.g., telephone/betting records), to the Investigations Panel (see section 2.6.6-2.6.12 below)

- 2.6.6 The Betting Integrity Officer will co-ordinate the investigation and set up an Investigations Panel consisting of not less than three DSF staff/Board and/or volunteer members including the Chairman/Betting Integrity Officer.
- 2.6.7 The Investigations Panel will investigate the allegation. A member of the Investigations Panel will be allocated with the responsibility for leading the investigation process.
- 2.6.8 The Investigations Panel should establish the facts quickly and any threat of further corrupt betting and associated activity should be removed immediately.

The Investigations Panel is required to:

- act promptly in investigating the allegation and taking any action required (subject to the Chairman's approval where appropriate);
 - fully document the investigation process;
 - secure evidence in a manner which does not alert suspects at the outset of the investigation; and
 - ensure that the evidence is secured in a legally admissible form (e.g., evidence must be carefully preserved; it should not be handled, and no marks made on original documents; a record should be kept of anyone handling evidence).
- 2.6.9 Depending on the nature of the activity, the Investigations Panel may refer the matter to the Gambling Commission for consideration of an investigation of the criminal offence of cheating (section 42 of the Gambling Act 2005). Additionally, the Investigations Panel may wish to liaise with betting operators, European/International federations, the Police and the Sports Betting Group.
- 2.6.10 Depending on the nature of the fraud, the Investigations Panel may wish to contact external experts for advice.
- 2.6.11 The Investigations Panel must obtain the consent of the Chairman before contacting any of the third parties referred to in 2.6.9 and 2.6.10 above.
- 2.6.12 The Investigations Panel will prepare a report of its findings and recommendations to the Chair for final approval. The report will include details of:
- recommendations on how to deal with employees under suspicion (which may include action to suspend or dismiss an employee following discussion with DSF Board of Charity Trustees - employees under suspicion who are allowed to remain on the premises must be kept under constant surveillance; carry out an immediate search of the suspects work area, filing cabinets, computer files);
 - recommendations on how to deal with third parties under suspicion;

- recommendations for mitigating the threat of future corrupt betting and associated activity by taking appropriate action to improve controls;
- recommendations for disseminating the lessons learned from the experience in cases where there may be implications for the organisation as a whole; and
- recommendations on what information can be released externally if requested.

2.6.13 The Investigations Panel should liaise with the DSF Chairman and inform them precisely of what information can be released if requested. The Chairman should retain a record of what information was released and to whom.

2.6.14 If a member of Staff feels that his/her concerns have not been dealt with appropriately internally, you should also be aware that you are empowered to take any concerns to the relevant authorities and other associated external bodies including the Gambling Commission, so long as you act in good faith.

2.7 Compliance

2.7.1 This policy will be reviewed biennially unless circumstances dictate more frequent reviews.

2.7.2 Employees who breach this policy and procedure may be subject to disciplinary action.

2.7.3 Compliance of this policy will be monitored by the DSF (SCIO) Board of Charity Trustees.

2.8 Appendix A: Scottish Governing Bodies and Sporting Organisations Sporting Integrity – Guidance Note

A core function of all Scottish Governing Bodies (“SGBs”) and sporting organisations is to maintain, and be seen to be maintaining, the integrity of their sport. Integrity must be upheld in order to protect the reputation - and the financial and participatory viability - of sport. Sport must take action to protect itself from the threats posed to integrity by corrupt betting and associated activity both from within and outside the sport.

A new era for sport and betting

The relationship between sport and betting has changed profoundly over recent years. The proliferation of online betting (particularly in-play betting), the growth of betting exchanges (where it is possible to “lay to lose”) and an upsurge in the availability of “novelty bets” means betting on sport is more popular and easier than ever before. Betting markets are expanding, particularly when live broadcast coverage is available.

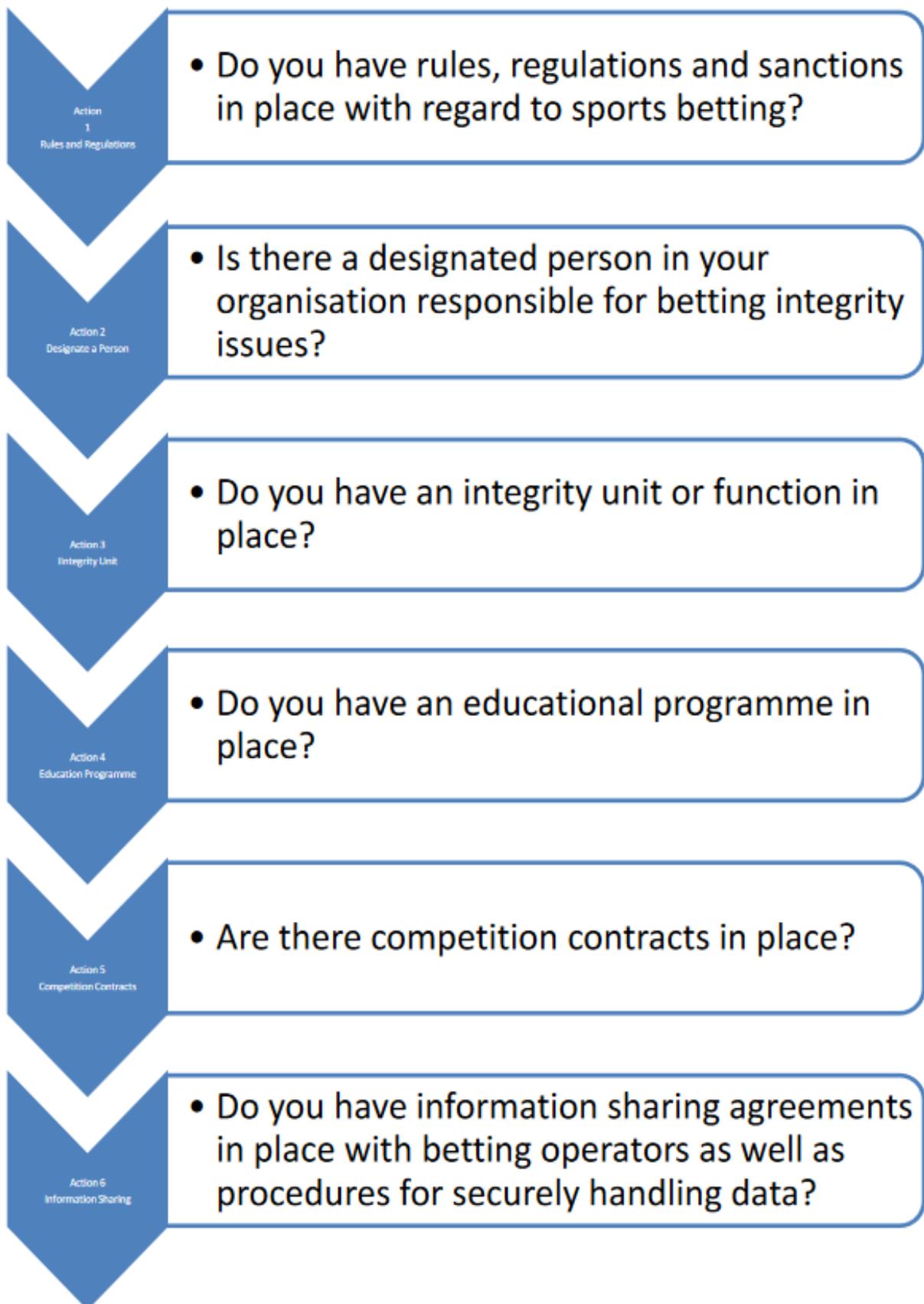
Be prepared

Even if betting is not currently perceived to be an issue in your sport, it is vital that the sport and its participants are protected. Being proactive, rather than reactive, is essential to protect sport before any damage is done. The advice contained within this document offers initial guidance to SGBs and sporting organisations in putting rules and regulations in place and complying with the code of conduct on integrity in sports in relation to betting recommended in the Report of the *Sports Betting Integrity Panel* published in February 2010.

While this document provides guidance on the minimum standards expected of sporting governing bodies and sporting organisations in putting anti-corruption rules and regulations in place, sporting governing bodies and sporting organisations are encouraged to adopt the highest standard possible in order to reflect the risks to their sport.

There are six actions that each sport’s governing body and sporting organisation go through in order to help safeguard their sport from the threats posed to integrity by betting:

6 Step Action Plan



Action 1

Establish Rules and Regulations on Betting

SGBs and sporting organisations must have robust rules and regulations in place that reflect the risks to their sport. The rules must make it clear to participants what is and what is not acceptable in relation to betting. They must also define to whom the rules apply (i.e., who exactly is a 'participant?').

SGBs should ensure that they include in their rules and regulations a provision that a participant shall not use in relation to betting any inside information that is not publicly available and which has been obtained by virtue of the participant's position within the sport, and in this respect SGBs and sporting organisations should within their rules clearly define what is meant by "inside information". This definition should be specific to the individual sport in question, based upon the risks that have been identified, and sufficiently wide-ranging to cover all perceived eventualities. The rules should also clearly state what can be considered misuse of inside information and the sanctions that can be expected should such rules be breached.

By way of example only, the Gambling Commission uses the following definition of "inside information": "Inside Information is information relating to the participation in, or the likely or actual outcome or development of, an event which is known by an individual as a result of their role in connection with that event and which is not in the public domain."

Consultation with participants when developing rules is an important step to producing a framework that is workable in practice and is supported by participants.

Sanctions must be sufficiently robust to act as an effective deterrent while also being proportionate for your particular sport.

The minimum rules identified in the Report of the Sports Betting Integrity Panel into betting integrity are set out below. They oblige a participant to:

- Not place or attempt to place a bet on a match, race or other event or competition in which he or his club participates in
- Not solicit or facilitate, or attempt to solicit or facilitate, another person to bet on a match, race or other event or competition in which he or his club participates in
- Not offer, or attempt to offer, a bribe in order to fix or contrive a result or the progress of a match, race or other event or competition in which he or his club participates in
- Not receive, or seek or attempt to receive, or seek a bribe in order to fix or contrive a result or the progress of a match, race or other event or competition in which he or his club participates in
- Report any approach or other activity which contravenes, or which may contravene, the sport's rules on betting, co-operate with any investigation and/or request for information including the provision of documentation (e.g.

telephone/betting records to officials engaged in the investigation of suspected integrity issues in the sport in relation to betting)

- Perform to the best of his ability in any match, race or other event in which he participates in.

Once rules and regulations are in place, a number of other steps should be considered. Some of these are very simple to introduce, while others are more complex and may only need to be implemented where a significant level of risk is identified.

Action 2

Designate a Responsible Person

All SGBs or sporting organisations should assign responsibility for betting integrity issues to a particular person within their organisation. Depending on the risk to your sport this may be no more than a nominal role, for example checking that your SGB or sporting organisation complies with the basic standards in *Report of the Sports Betting Integrity Panel*. As and when required, this designated person can liaise with participants, the Gambling Commission, betting operators, European/International federations and the Police.

Action 3

Integrity Unit

If the volume of betting markets in your sport is substantial, or you have identified bets that are easy to corrupt, it is recommended that you consider establishing a dedicated integrity unit. Not all sports will need to set up dedicated integrity units, but those that identify a significant level of risk to integrity from betting should look to do so.

Tennis, Cricket, Horseracing, Snooker and Darts are examples of sports that have established dedicated units. In the case of the British Horseracing Authority, their *Integrity Services, Compliance & Licensing Department* aims to identify and prevent breaches of the rules and malpractice in horseracing. This is achieved by gathering information, monitoring real-time betting markets for suspicious betting activity, conducting investigations and inspecting training establishments. It is vital that, if there is any suspicious betting activity on your sport, action is taken.

If there is reluctance on the part of the Gambling Commission or the Police to become involved, then the SGB or sporting organisation should take action by fully investigating any allegation. If it does not have the resources to carry out an investigation they should consider requesting outside assistance. In the first instance this may be by calling **sportscotland** for guidance.

Action 4

Educational Programme

It is essential that participants are fully aware of the relevant rules and regulations in their sport and in this respect participant education has a major part to play when it comes to minimising the risks to integrity posed by betting. It is recommended that, as part of your standard training programmes, you include a section on betting integrity. If you consider your sport to be at significant risk, it is recommended that you run dedicated education programmes.

These can come in a variety of different forms but should provide face-to-face education alongside other mediums such as explanatory notes, online training, posters, cards and brochures.

For example, the *British Horseracing Authority*, *Professional Cricketers Association* and *Professional Footballers Association* each have relevant education programmes on sports betting integrity.

Another document that may be useful is the *EU Athletes Code of Conduct on Sports Betting for Players*, which sets out the guiding principles and provides general advice to all throughout Europe on the issues surrounding the integrity of sport and betting.

Finally, the section on education in the *Report of the Sports Betting Integrity Panel* contains a number of recommendations on what SGBs should consider in relation to participant education.

Action 5

Competition Contract

For those taking part in competitions there should be a requirement to sign contracts beforehand which clearly spell out their obligations with regard to betting. For example, at the 2011 British Golf Open all players and caddies were required by the R&A to sign an agreement pledging their compliance with all the *PGA European Tour's Anti-Gaming* policies.

Action 6

Information Sharing and Data Handling

If bets are taken on your sport, as a minimum the Gambling Commission and betting operators should know whom to contact in your organisation should suspicious betting patterns be discovered.

SGBs and sporting organisations must also have systems in place to be able to securely handle sensitive data. It is also important to establish information sharing agreements and Memoranda of Understanding with betting organisations such as the Association of British Bookmakers (ABB) and betting exchanges such as Betfair and Betdaq.

2.9 Appendix B - Section 42 – Gambling Act 2005

42 Cheating

- (1) A person commits an offence if he—
 - (a) cheats at gambling, or
 - (b) does anything for the purpose of enabling or assisting another person to cheat at gambling.
- (2) For the purposes of subsection (1) it is immaterial whether a person who cheats—
 - (a) improves his chances of winning anything, or
 - (b) wins anything.
- (3) Without prejudice to the generality of subsection (1) cheating at gambling may, in particular, consist of actual or attempted deception or interference in connection with—
 - (a) the process by which gambling is conducted, or
 - (b) a real or virtual game, race or other event or process to which gambling relates.
- (4) A person guilty of an offence under this section shall be liable—
 - (a) on conviction on indictment, to imprisonment for a term not exceeding two years, to a fine or to both, or
 - (b) on summary conviction, to imprisonment for a term not exceeding 51 weeks, to a fine not exceeding the statutory maximum or to both.
- (5) In the application of subsection (4) to Scotland the reference to 51 weeks shall have effect as a reference to six months.
- (6) Section 17 of the Gaming Act 1845 (c. 109) (winning by cheating) shall cease to have effect.

3.0 Anti-Corruption & Bribery Policy

3.1 About this Policy

It is the policy of Disability Sport Fife (SCIO) to conduct business in an honest and ethical manner. DSF takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all business dealings and relationships.

Any employee who breaches this policy will face disciplinary action in line with the Organisations Human Resources Policies & Procedures, 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 applies to all persons working for DSF or on behalf of the Organisation 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.

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

3.2 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 anyway. 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 the Chairman of DSF.

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 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.

3.3 Gifts

Staff may accept gifts of low value such as calendars, diaries, and pens. It is not necessary to ascertain the exact value of such gifts but anything that appears to be worth more than £100 must be formally recorded on the Association's Register of Interests which will be maintained by the DSF Chairman. Staff should exercise careful judgement in such cases. Promotional

gifts of low value such as branded stationary may be given or accepted from existing customers, suppliers and business partners.

The offer of a gift should be reported to the DSF Chairman who will decide based on the nature, volume and origin of the gift whether it should be refused or accepted.

3.4 Hospitality

Working lunches provided on a modest scale and on an occasional basis are part of normal business practice and staff are not required to obtain formal approval to attend them. However, if staff receive a prior invitation to a more formal lunch or dinner, they must declare their intention to attend to the Chairman.

As with gifts, the refusal of any invitation may cause embarrassment, and this must be taken into account by anyone considering or approving such an invitation. Invitations to other events such as launches, conferences or sporting events etc should be subject to the same scrutiny as above.

Invitations to attend all-expenses paid study tours, site inspections or product demonstrations must have prior approval from the DSF Chairman particularly if overseas travel is involved.

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. A gift or hospitality will not be appropriate if it is unduly lavish or extravagant or could be seen as an inducement or reward for preferential treatment (for example, during contractual negotiations or a tender process).

3.5 Record-keeping

To counter any accusation or suspicion of improper conduct, DSF will maintain a central Register of Interests. This register will be maintained by the DSF Chairman.

All gifts and offers of hospitality with a value in excess of £100 should be recorded on the register. This applies whether they have been accepted or declined. The register will be inspected annually.

You must also submit all expenses claims relating to hospitality, gifts or payments to third parties and record the reason for expenditure.

All accounts, invoices and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

3.6 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, you must notify the Chairman or report it in accordance with the DSF Public Interest Disclosure (Whistleblowing) Policy as soon as possible.

4.0 Purchasing & Procurement Policy

Disability Sport Fife (SCIO): Purchasing and Procurement Policy

4.1 Introduction

- 4.1.1 Procurement is the process of acquisition, usually by means of a contractual agreement after public competition between two or more parties. This document explains our purchasing and procurement procedures and the steps that must be taken when the organisation is required to purchase goods, services, works and or other supplies.

4.2 Principles

- 4.2.1. Procurement is about ensuring the “best value for money”. While “best value for money” will be the primary objective of the procurement policy, there are principles which must be adhered to. These are as follows:

Competitive Supply: procurement should be carried out by competition unless there are convincing reasons to the contrary.

Efficiency: procurement processes should be carried out as cost effectively as possible.

Impartiality: suppliers should be treated fairly and without unfair discrimination, including commercial confidentiality where required. Unnecessary burdens or constraints should not be placed on suppliers or potential suppliers.

Integrity: there should be no corruption or collusion with suppliers or others.

Informed Decision Making: decisions should be based on accurate information.

Transparency: there should be an openness and clarity on procurement policy and its delivery.

- 4.2.2 Disability Sport Fife (SCIO) employees and Board of Charity Trustees must adhere to the above guidelines. Any person who does not follow this policy may be the subject to disciplinary action.

4.3 Disability Sport Fife (SCIO) Policy

- 4.3.1 Disability Sport Fife is committed to the development and maintenance of an equitable, fair and transparent procurement policy for the purchasing of goods, services, works, or other supplies.

4.4 Roles and Responsibilities

4.4.1 Employees and Board of Charity Trustees

Employees and Trustees are expected to act in accordance with the Organisation’s standards of Business Conduct and to follow guidance on the receipt of gifts or

hospitality, available from personnel within the sport and potential and/or existing suppliers of goods services, works or other supplies.

- 4.4.2 Disability Sport Fife rules and regulations place an obligation on all employees to act in accordance with best practice. The Board of Charity Trustees are subject to the same high standards of accountability and are required to declare and register any interests that might potentially conflict with the organisation's purchasing and procurement policy.

4.5 Goods and Services

- 4.5.1 Before placing an order for any goods, services, works and other supplies etc the organisation should obtain the requisite number of quotations/tenders from potential suppliers/contractors. Disability Sport Fife should adhere to the following guidelines as detailed within their internal procedures.

4.6 Estimated Value of Order

- 4.6.1 For items under £500 purchasing decisions are at the discretion of the DSF Chairman and Honorary Treasurer who are responsible for ensuring value for money.
- 4.6.2 For items over £501 we will seek written quotes from suppliers based on a clear specification. Our decision will be based on value for money which might include an unbiased consideration of the following factors:
- Price
 - Expertise/knowledge
 - Ability to deliver the required service quality and timescales (which may include attendance on-site if necessary)
 - Warranty and guarantees.
 - Experience/reputation/recommendation
- 4.6.3 For items above £5000 we will normally advertise the opportunity and draw up a written specification. Where we advertise and the selection criteria will depend on the nature of the opportunity and the likely suppliers – this may include the Disability Sport Fife website and local, national, or international trade press.
- 4.6.4 We may select a preferred supplier directly where the service required:
- is highly specialist and we cannot identify potential alternative suppliers.
 - is highly commercially confidential and we do not wish to release information about our need for the service to the market
 - extends or relies on knowledge from relevant previous collaboration with one particular supplier.

In these cases, we will take reasonable steps to establish that the supplier's costs are acceptable e.g., by comparing with day rates from other similar businesses where this is practicable and record and retain that information in the form of a file note.

The final purchasing decisions rest with the Chairman and Honorary Treasurer initially and if necessary, the Board of Charity Trustees.

4.7 Document Retention

Documentation relating to purchasing and procurement will be retained as documented below before being securely destroyed:

Tender Documentation (Successful) – 5 years after contract completion

Tender Documentation Unsuccessful and pre-qualification questionnaires – 1 year after contract award

Contract Management Records – 5 Years after contract completion.

5.0 Conflicts of Interest Policy

Disability Sport Fife (SCIO) – Conflicts of Interest Policy

This policy applies to Disability Sport Fife (SCIO) Trustees and all staff, be they executive or non-executive, paid or unpaid.

5.1 Why we have a policy.

Trustees have a legal obligation to act in the best interests of DSF, and in accordance with DSF's governing document, and to avoid situations where there may be a potential conflict of interest. Staff and volunteers have similar obligations.

A conflict of interest or loyalty arises where an individual's personal interests or loyalties, or the interests or loyalties which that individual owes to another organisation, conflict with the interests of DSF. The individuals must manage any situation where they have the potential to benefit personally from their position or are influenced by conflicting loyalties. This also applies to individuals who have a close family member who has an interest in such a matter (including carers)

Examples of conflicts include:

- Direct financial gain or benefit to the individual or close family member, such as payment to an individual for services provided to DSF or the award of a contract to another organisation in which an individual or close family member has an interest and from which they will receive a financial benefit.
- Indirect financial gain, such as employment by DSF of a close family member or friend of an individual, or external funding or personal interests or loyalties; or
- Non-financial gain.

Such conflicts may create problems; they can:

- Inhibit free discussion;
- Result in decisions or actions that are not in the interests of DSF; and
- Risk the impression that DSF has acted improperly.

The aim of this policy is to protect both the organisation and the individuals involved from any appearance of impropriety.

5.2 The Declaration of Interests

Accordingly, we are asking Trustees and all staff to declare their interests in connection with their role with DSF on an annual basis. A declaration of interests form is provided for this purpose (**see Appendix A**), listing the types of interest you should declare, and will be maintained by the DSF (SCIO) Chairman with support from the DSF Coordinator. All Trustees and staff must reconfirm their interests annually, even if this is a nil declaration.

To be effective, the declaration of interests needs to be updated at least annually, and also when any changes occur.

If you are not sure what to declare, or whether/when your declaration needs to be updated, please err on the side of caution. If you would like to discuss this issue, please contact the DSF Chairman for confidential guidance.

5.3 Register of Interests

This register of interests shall also be used to record all gifts and hospitality of a value over £100 received by the Trustees and staff.

Gifts and hospitality will be recorded on the Organisation's register of interests (**see Appendix B**), which will be maintained by the DSF (SCIO) Chairman with support from the DSF Coordinator. The register will be accessible by Trustees and staff, with all incidences of access to be formally recorded.

5.4 Data Protection

The information provided will be processed in accordance with data protection principles as set out in the General Data Protection Regulations 2018. Data will be processed only to ensure that Trustees and all staff act in the best interests of DSF. The information provided will not be used for any other purpose.

5.5 What to do if you face a Conflict of Interest

If you are a beneficiary of DSF's services, or the carer/spouse/family member/significant other of someone who uses DSF's services, you should not be involved in decisions that directly affect the service that you, or the person you care for/spouse/family member, receive(s). You should declare your interest at the earliest opportunity and withdraw from any subsequent discussion. The same applies if you face a conflict for any other reason. You may, however, participate in discussions from which you may indirectly benefit, for example, where the benefits are universal to all users, or where your benefit is minimal.

If you fail to declare an interest that is known to the Chairman and/or the Honorary Treasurer, the Chairman of the Board and/or the Honorary Treasurer will make that interest known on your behalf. You may be subject to disciplinary action if you knowingly withhold any interest from which you stand to benefit in contravention of the terms of this policy.

5.6 Decisions taken where a Trustee or Member of Staff has an interest

In the event of the Board of Charity Trustees having to decide upon a question in which a Trustee or member of staff has an interest, all decisions will be made by vote, with simple majority required. A quorum must be present for discussion and decision; interested parties will not be counted when deciding whether the meeting is quorate. Interested Board members may not vote on matters affecting their own interests.

Conflicts of interest will be a standing agenda item at some Board meetings and all decisions under a conflict of interest will be recorded and reported in the minutes of the meeting. The report will record:

- The nature and extent of the conflict;
- An outline of the discussion;
- The actions taken to manage the conflict.

Where a Trustees benefits from the decision, this will be reported in the annual accounts.

All payment or benefits in kind to Trustees will be reported in the annual accounts, with amounts for each Trustee listed for the year in question.

Where a member of DSF staff is connected to a party involved in the supply of a service or product to the Organisation, this information will also be fully disclosed in the annual accounts.

Independent external moderation through **sportscotland/** Scottish Disability Sport will be used where conflicts cannot be resolved through the usual procedures.

5.7 Managing Contracts

You must not be involved in managing or monitoring a contract in which you have an interest. Monitoring arrangements for such contracts will include provisions for an independent challenge of bills and invoices, and termination of the contract if the relationship is unsatisfactory.

5.8 Conflict Summary Register

DSF will maintain a summary register detailing interests, including a section for how any declared conflicts will be managed.

For further information see;

ICSA's Best Practice Guide *Managing Conflicts of Interest in the Not-for-Profit Sector* (Revised 2007) <https://www.icsa.org.uk/knowledge/resources/declaration-charity-trustees>

5.9 Appendix A:

DISABILITY SPORT FIFE (SCIO) DECLARATION OF INTERESTS

I am a Trustee/employee* (**delete as appropriate*) of Disability Sport Fife (SCIO) I have set out below my interests in accordance with the Association's conflicts of interest policy.

Name:	
Position:	
Date:	
Category	<i>Please give details of the interest and whether it applies to yourself or, where appropriate, a member of your immediate family, connected persons, someone you care for or some other close person; connection.</i>
Current employment and any previous employment in which you continue to have a financial interest.	
Appointments (voluntary or otherwise), e.g., Directorships, local authority membership, tribunals, etc.	
Membership of any professional bodies, special interest groups or mutual support organisations.	
Investments in unlisted companies, partnerships and other forms of business, major shareholdings (charities may set a figure here, e.g. more than 1% or 5% of issued capital) and beneficial interests.	
Do you use, or care for a user of the organisation's services?	
Any contractual relationship with the organisation or any subsidiaries.	
Any other conflicts that are not covered by the above.	

To the best of my knowledge, the information is complete and correct. I undertake to update as necessary the information provided, and to review the accuracy of the information on an annual basis. I give my consent for it to be used for the purposes described in the conflicts of interest policy and for no other purpose.

Signed: _____

Date: _____

5.10 Appendix B:

DISABILITY SPORT FIFE (SCIO) REGISTER OF INTERESTS

DSF has the responsibility of ensuring that Trustees and staff are not perceived to be influenced in the performance of their duties by the receipt of gifts and/or hospitality from external persons or organisations. Trustees and staff are required to record the receipt of any gifts and/or hospitality with a value more than £100 received because of their position with DSF.

Trustees and staff are reminded that DSF is required to provide the complete register to any interested parties on request and therefore it is important that it is up-to-date, accurate and comprehensive.

Please note an annual return is required from all Trustees and staff.

Name:				
Position:				
Date:				
GIFTS				
Date Received	Description	Approximate Value	Circumstances	Donor

HOSPITALITY			
Date	Nature of Hospitality	Event/Circumstance	Host

Signed: _____ Date: _____

6.0 Public Interest Disclosure (Whistleblowing) Policy

Disability Sport Fife (SCIO) – Public Interest Disclosure (Whistleblowing) Policy

6.1 Purpose

DSF is committed to achieving the highest possible standards of service and the highest possible ethical standards in all its practices and dealings. DSF is also committed to developing a culture of openness, accountability, and integrity. To help achieve these aims, this policy encourages individuals to raise any concerns they may have about possible misconduct or malpractice at an early stage and in the correct way.

6.2 Background

The Public Interest Disclosure Act 1998 allows individuals to disclose certain issues to particular external parties where there is good reason to believe that internal disclosure will not be taken seriously or will cause the individual making the disclosure to be penalised in some way. However, DSF encourages you to discuss your concerns internally whenever possible by reporting any wrongdoing or malpractice which you believe has occurred or is likely to occur.

We recognise that you may not always feel comfortable about discussing your concerns, especially if you believe that DSF itself or any of its Trustees, volunteers or staff are responsible for the wrongdoing. The aim of this policy is to ensure that you are confident that you can raise any legitimate concerns about wrongdoing or in the knowledge that:

- It will be taken seriously
- It will be treated as confidential, as far as possible; and
- You will not be subject to any detriment

6.3 What Should be Disclosed?

It is your duty to report any situation or matter which you reasonably believe might show that one or more of the following matters has occurred, is occurring or is likely to occur in the future;

- A criminal offence
- A failure to comply with a legal obligation.
- A miscarriage of justice
- A health and safety danger
- An environmental risk
- An act of misconduct
- Dishonesty or fraud
- Bribery
- A breach of Employer's rules, or procedures of any regulatory body, or
- A concealment of any of the above

6.4 Complaints Procedure

6.4.1 Informal Steps

This stage is appropriate where you simply want the behaviour to stop and you wish to attempt to resolve the problem informally. The informal stage will not result in any formal internal investigation or disciplinary action, but it is intended to enable you to resolve the matter yourself without it going any further.

You can seek to resolve a matter informally by approaching the person responsible directly, making it clear to them the behaviour in question is offensive, is not welcome and should be stopped. Alternatively, you may prefer to put it in writing to them. A copy of any written letter should be kept and a note of the dates and what was said by all involved. This may be needed as evidence should the conduct or behaviour continue or subsequently recur.

6.4.2 Formal Steps

Where informal methods fail, or you choose not to use them or the problem is sufficiently serious, a formal complaint can be made. The complaint should be made in writing, describing the incident(s) as fully as possible, including the name of the person responsible, the date(s) and time(s) when the incident(s) occurred, the names of any witnesses and any action taken so far to attempt to stop the conduct or behaviour. This complaint should be given to the DSF Chairman.

Thereafter the matter will be dealt with as follows:

- All complaints will be managed in a timely and confidential manner via an independent investigation. The investigation will be thorough, impartial and objective and will be carried out with sensitivity and with due respect for the rights of both the complainant and the alleged offender.
- Where appropriate and/or possible, consideration will be given to ensuring that you and alleged offender are not required to work/participate together whilst the complaint is under investigation.
- An investigating officer/Chairman will be appointed to investigate the complaint, and will interview you, the person against whom allegations are made and any relevant witnesses. All those interviewed will be permitted to be accompanied by a work colleague, friend, or legal representative.
- The importance of confidentiality will be stressed to all those interviewed, and everyone will be strictly prohibited from discussing the complaint. Breach of confidentiality may give rise to disciplinary action.
- The investigation will focus on the facts of the complaint. Notes will be kept of all stages of the investigation and those interviewed will receive notes of the interview to agree. Parties will not be required to repeat distressing or embarrassing details any more than is necessary.
- At the conclusion of the investigation, the Chairman will submit a report to the DSF Board of Charity Trustees. The Chairman will usually meet with you to report their findings back to you with 2 weeks of your complaint first being reported. A copy of the Chairman's report together with the findings will be provided to you and to the alleged offender.

- If disciplinary action is justified it will be conducted in accordance with the DSF Disciplinary Procedure.
- Any disciplinary action taken will reflect the severity of the offence.

DSF will seek to ensure that you are not in any way penalised whether directly or indirectly for bringing a complaint and the situation will be monitored to ensure that the conduct/behaviour has stopped.

Even where a complaint is not upheld. For example, where the evidence is inconclusive, consideration will be given to effecting arrangements which will enable the parties not to continue to work/participate together against the wishes of either party.

You will be informed of the outcome as soon as possible following disciplinary action.

6.4.3 Appeal

If you are dissatisfied with the outcome, or with the way in which the complaint was handled, you have the right of appeal. Any appeal should be made to the Chairman. All appeals must be made in writing, stating the full grounds of appeal, within 1 week of the date on which you were informed of the outcome of your complaint. Failure to lodge the written notice within that time period will be regarded as acceptance of the findings and no further right of appeal will be available.

An appeal meeting will take place within 2 weeks of the written notice of appeal or as soon as reasonably practicable thereafter. You must take all reasonable steps to attend the meeting. The person hearing your appeal will meet to discuss your appeal. You may be accompanied by a colleague, friend or legal representative. You will be notified of the outcome of the appeal within 1 week of this meeting. This is the final stage of the procedure.

6.4.4 Protection from Detriment

Anyone who makes a complaint or participates in any investigation under this policy in good faith will be protected from any form of intimidation or victimisation and shall not be subjected to any form of detrimental treatment as a result of their involvement,

If you believe you are the victim of such treatment you should bring it to the attention of the Chairman as soon as possible.

Anyone who is, after investigation, found to have provided false information or to have acted in bad faith will be subject to action under the DSF Disciplinary Procedure.

6.5 External Authorities

DSF recognises there may be matters that cannot be dealt with internally and external authorities will need to become involved. Where this is necessary DSF reserves the right to make such a referral without your consent.

7.0 Codes of Conduct

7.1 Disability Sport Fife (SCIO) - Athlete/ Coaches/ Volunteer Code of Conduct

DSF is committed to the highest standards in sport and expects all coaches and volunteers to honour and observe the following code.

Respect for Others

- I will respect the rights, dignity and worth of children, athletes, players, volunteers, other coaches, friends, families and spectators while representing DSF.
- I will treat everybody equally regardless of disability, gender reassignment, sex or sexual orientation, ethnic origin, marriage and civil partnership, pregnancy or maternity, religion or race.
- I will be a positive role model for, athletes, players, other coaches and volunteers.

Be Professional and Responsible

- My manner, language, punctuality and preparation will be of the high standard expected by DSF.
- I will be aware that I am representing DSF while coaching and will ensure that I do not bring DSF or my sport into disrepute. This includes personal behaviour and communication including social media.
- I will communicate with DSF in advance if I am ill or unable to fulfil my coaching obligations in advance.
- I will display control, respect, dignity and professionalism to all involved and associated with DSF. (coaches, athletes, players, volunteers, opponents, teammates, officials, administrators, parents and spectators)
- I will encourage other athletes, players, volunteers and other coaches to demonstrate the same qualities.
- I will refrain from any form of personal abuse towards athletes, players and others, including verbal, physical and emotional abuse.
- I will be knowledgeable about the sports rules required for each sport with which I'm involved.
- I shall set exemplary standards in dress and uniform for the sports in which I am involved.
- I will try at all times to ensure that I am ready to compete and, in a position, to perform to their full potential.
- I shall practice and play within the spirit of the game/sport and uphold the highest standards of fair play at all times.
- I will comply with relevant DFS policies and procedures and confirm that I have read and understood the following.

Anti-Corruption (Bribery) Policy
Anti-Corruption (sports Betting) Policy
Anti-Doping Policy
Data Protection Policy

Health and Safety for Athletes, Players, Volunteers and Coaches

- I will ensure, as far as I am able, that any equipment I use and facilities I access are safe to use.
- I will ensure that the equipment, clothing, rules, training and the environment are appropriate for the age and ability of the athlete and players in my charge.
- I will be aware of the limitations as an athlete or coach that are highlighted on any medical information I provide for DSF.
- I will maintain the same interest and support to any injured or sick athletes, players and coaches.

I understand that if this Code of Conduct is violated in any way, it could prohibit me from being involved with Disability Sport Fife.

Signed: _____

Print Name: _____

7.2 Disability Sport Fife (SCIO) – Parents Code of Conduct

DSF is committed to the highest standards in sport and expects all parents/guardians/carers/significant others to honour and observe the following code.

All parents/guardians/carers/significant others are expected to:

- Respect the rights, dignity and worth of other athletes, players, volunteers, coaches, friends, families and spectators.
- Treat everyone equally regardless of disability gender reassignment, sex or sexual orientation, ethnic origin, marriage and civil partnership, pregnancy or maternity, religion or race.
- Ensure athletes/players are on time to events/competitions and are left safely in the care of the club/team and are picked up promptly.
- Keep coaches/event organiser up to date with any medical/contact changes.
- Be a positive role model for the athletes, players and the other parents.
- Exhibit manners and language of the high standard expected by DSF.
- Display control, respect, dignity and professionalism to all involved and associated with DSF (coaches, athletes, players, volunteers, opponents, teammates, officials, administrators, other parents and spectators) and encourage participants to demonstrate the same qualities.
- Refrain from any form of personal abuse towards athletes, players and others, including verbal, physical and emotional abuse.
- Encourage your child to learn the rules and to participate within them. Help your child to recognise good sportsmanship and to applaud the good performances of all.
- Recognise the value and importance of coaches to your child. Do not undermine them, they give their time and effort to provide a recreational activity for your child's benefit.
- Not interrupt the coach or attempt to communicate with a participant whilst a coaching session is in progress.
- Encourage your child but do not coach. Advice needs to be given by the club/event staff. Conflicting advice will only lead to confusion and undermine confidence.
- Do not physically or verbally abuse or harass anyone associated with the sport (participant, Coach, Volunteers, Officials or Spectators.)
- Discourage challenging/arguing with officials.
- Be positive about the club and how it works. If you see a problem or have a concern please raise this with a member of the club committee or event staff, who will ensure that the matter receives attention.
- Support your child's involvement and help them to enjoy their sport.

I understand that if this Code of Conduct is violated in any way, it could prohibit me from being involved with Disability Sport Fife.

Signed: _____

Print Name: _____

7.3 Code of Conduct for Members of the Disability Sport Fife Board of Charity Trustees

7.3.1 Introduction

Charitable organisations are, by definition controlled by a voluntary Board of Charity Trustees referred to as the Board of Trustees. For ease of reference the term Board has been used throughout this Code to refer to the DSF Board of Charity Trustees.

The significant role which voluntary/charitable organisations play in all areas of public life and the importance the sector itself attaches to maintaining high standards of governance has promoted the development, by DSF, of a Code of Conduct for Board members – to regulate their participation in decision making, and to clarify how an organisation can ensure that conflicts of interest are recognised and handled appropriately. Board members bring a wide range of interests, professional and private, to DSF. Such experience is welcome but can give rise to at least the perception of potential conflicts of interest. Openness and transparency are the keys to good practice and this Code of Conduct, supported by a Register of Interests, seeks to provide the framework on which DSF can build and demonstrate the highest standards of governance.

7.3.2 Implementation

In adopting this Code of Conduct for its Board members DSF must ensure that it develops appropriate policies and procedures for the implementation of the Code.

DSF will adopt different ways of ensuring that all relevant interests are declared and conflicts of interest, immediate or potential, are recognised and dealt with. This Code is a guide to good practice and will be supplemented with procedures and policies relevant to the DSF. DSF will seek to clarify its expectations of Board members, communicate these expectations effectively through an induction and training programme and institute clear procedures to handle suspected breaches of the responsibility, or its Code of Conduct. As part of that process DSF will identify and illustrate the circumstances on which action might be taken. The procedures might include empowering the Board to remove a member in the event of a serious breach of the Code, an appeals mechanism, or how a member might be disciplined for a less serious breach.

7.3.3 Responsibilities

The responsibilities of a DSF Board of Charity Trustees member can be summarised as: -

- The strategic direction and control of DSF accordingly to agreed priorities and Board decisions;
- The risk, financial and otherwise and legal obligations arising out of control of the organisation;
- Ensuring that DSF operates within the law and within the limits set by its own Constitution;
- Ensuring that DSF exercises responsibility in financial and other affairs and remains solvent;
- Ensuring that Board members receive the information, advice and training in order to make informed decisions and carry out their duties effectively;
- Ensuring appropriate frameworks for the delegation of work to staff.

- Ensuring there is a broad balance of skills on the Committee, utilising the power to co-opt were necessary;
- Supporting, guiding and monitoring the staff in all aspects of the work of DSF;
- Monitoring and reviewing all aspects of the organisations performance;
- Ensuring that the organisation demonstrates best practice in all its areas of work, including the development of strategies to combat discrimination;
- Establishing clear strategic, business and financial objectives;
- Protecting the assets of the organisation.

7.3.4 Code of Conduct

- Board members have a duty to accept the responsibilities of their position and to act at all times in the best interests of the organisation, ahead of any other professional or personal interest. The general principle to be observed is that the Board member will avoid action or inaction which cannot be justified to the Board of Charity Trustees, the organisation's members, users or the public. Equally a Board member should be alert to anything which might give rise to suspicion of improper conduct.
- Board members and staff must maintain collective responsibility for decisions and keep decision making confidential.
- Board members are required to declare any or all relevant interest during meetings, immediately it becomes apparent that such interest has relevance to the matter under consideration by the Board. If the interest is a financial one, for example, if they or their employers is a beneficiary or a potential beneficiary, then the Board member is obliged to withdraw from the meeting and take no further part in the decision-making process on this matter.
- If the interest is not financial but might be recently considered to be significant, the Board member should declare the nature of the interest immediately. It will then be for the Chairman to determine whether the interest is sufficiently substantial to warrant either the member being asked to leave the meeting or abstain from voting.
- In either 3 or 4 above, the interest declared and the action taken will be recorded in the Minutes of the Meeting and the Register of Members Interest will be checked and amended if necessary.
- If the interest concerns family or personal connections with individuals within an organisation likely to benefit from the decision under discussion, or business or other relationships, with individuals the Board member would not normally be asked to abstain from voting or to leave the meeting but would be required to state clearly and have recorded the nature of his or her interest.
- For further information please refer to the DSF Conflicts of Interest Policy Section of the Compliance and Ethics Policies and Procedures

7.3.5 Declaration

All Board of Charity Trustee members shall be required to sign a formal declaration to their election appointment or any renewal of that appointment.

“I have read and understood my duties and responsibilities in accepting a position on the Board of Charity Trustees of Disability Sport Fife and undertake to fill these duties in good faith in accordance with the provisions of this Code of Conduct”.

I (insert full name)

.....

am over 18 years of age. I am not an undischarged bankrupt; have no financial or other relevant interests in DSF, not formally declared; am not legally disqualified from serving as a Board of Charity Trustee member according to the provisions of either the Company Law, or the Law Reform (Scotland) Act, 1990. I agree to abide by this Code of Conduct and to inform the Register of any relevant interest during any meeting of the Board where personal or professional interests are at stake. I agree to uphold objectives and policies of DSF and to encourage best practice in all areas of its work.

Signed

Date

7.3.6 Register of Interests

DSF will establish and maintain a Register of its Member's interest to support the foregoing Code of Conduct. Board of Charity Trustee members will be obliged to declare any relevant interest on acceptance of a Board position. The Register will be updated at least annually following the Annual General Meeting, and immediately to record any declarations made at Board meetings. The Register should be made available on request to members, funders and the public with the proviso that no contact details will be divulged without permission to safeguard Board member's privacy. The Register will contain at least the following information:-

- Name, address and contact details;
- Employer and position held;
- Details of other committee memberships and offices held in the last five years;
- Details of any significant consultancies undertaken over the last five years;
- Any financial stake in relevant organisations, or as a beneficiary of such an organisation;
- Any spouse or partner in relevant organisations, or as a beneficiary of such an organisation;
- Any other interests which may be reasonably construed as creating conflict of interest;
- Any family member where construed as a conflict of interest.

8.0 Ethics Statement

Disability Sport Fife (SCIO) – Ethics Statement

Sport is important. It can have a huge impact on people's lives, bringing them together and helping them to be happy, healthy, and fulfilled. It can build communities.

Sport at a local level can help to establish a community's values, create harmony, and even improve an area's economy. So, it is important that sport is played, officiated and governed fairly. All of us who participate in sport, whether as athletes, administrators, officials, coaches, or supporters – must take personal responsibility for ensuring that sport is fun and fair for all. If we fail to do so, we will all suffer, and so will our sports. It is therefore essential that we maintain high ethical standards.

But what does that mean? There is no simple answer to this question, but ethics is not just about shaking someone's hand at end of a game. Instead, having high ethical standards is an ongoing process of learning and improvement. One workable definition is that ethics in sport is the systematic application of moral rules, principles, values, and norms.

The golden threads of inclusion and equality are fundamental to everything we do at Disability Sport Fife (SCIO). To demonstrate inclusion and equality in practice the following values are essential:

- Respect
- Integrity
- Fairness
- Transparency

We at Disability Sport Fife take ethics very seriously and we actively promote ethical participation in sport through a wide range of policies and programmes:

- Equality Policy
- Safeguarding Policy
- Code of Conduct
- Anti-Doping Policy
- Valuing Volunteers
- Data Protection Policy

Establishing, living, and embodying ethical values is imperative to the successful running of sport.

9.0 Sponsorship Policy

Disability Sport Fife (SCIO) – Sponsorship Policy

9.1 Introduction

Sponsorship can provide a good basis for a partnership between Disability Sport Fife (DSF) and an external organisation, taking many formats to suit differing needs and capabilities. Sponsorship, when managed correctly, should benefit both organisations, but for this to happen it requires work and the understanding that both partners have a role to play. If it is not managed well, sponsorship has the potential to cause financial, reputational, and operational damage to both parties. To ensure maximum benefit and to protect against liability, this policy sets out how DSF will enter into sponsorship agreements.

This policy applies to DSF Trustees and all staff, be they executive or non-executive, paid or unpaid, professional or volunteer.

9.2 Definition of Sponsorship

Any agreement where DSF receives a conditional benefit from a third party. The sponsorship relationship is designed to develop a beneficial relationship that achieves mutually agreed objectives. DSF's sponsorship portfolio may include a variety of properties, including:

Competitions, events, projects, programmes, athletes, teams, clothing, and equipment.

- **Benefit** – Any money, service or product provided by the third-party organisation. (A non-exhaustive list of examples; money, products, services, administrative support, marketing assistance, etc.)
- **Conditional** – Where the benefit is provided in return for a specific action from DSF. (A non-exhaustive list of examples; the displaying of logos on DSF kit/equipment/webpage/letterheads or at events, preferential access to DSF events/services/products/data, behavioural change on behalf of DSF)

The policy relates to those properties where DSF is the Rights Holder or has an agreement for some rights, for certain events the rights may be owned by a third party.

9.3 Exclusions

The following are examples of what would not be considered as sponsorship;

- Any donations, which is where the benefit is provided without any conditions.
- Organisations providing grant funding or partnership investment
- Any benefit for which DSF pays the market rate.

9.4 Advantages of Sponsorship

For businesses, sponsorship offers the opportunity to publicise the company or organisation's name through its links with DSF, thereby raising its profile and image. DSF values sponsorship because it offers the opportunity for financial or in-kind support which might otherwise be unavailable.

9.5 Risk Associated with Sponsorship

Sponsorship is a commercial arrangement and should not be entered into without a full evaluation of pros and cons. The risks must be assessed in terms of both the likelihood of occurrence and the impact on DSF should the identified risk occur. Due to the liabilities that a potential sponsorship arrangement place on DSF, there need to be strict controls in place to assess and decide on which opportunities are suitable.

9.6 Aims

DSF aims to secure sponsorship funding as well as in-kind support and added value benefits, to the Association, its development programmes, athletes, members, and events. The aims of this policy are to ensure that;

- Sponsors and partners are selected on the basis that they provide an appropriate and ethical fit with strategic aims of DSF.
- Sponsor relationships do not compromise the independence of DSF or its ability to act independently.
- Sponsor relationships do not compromise the values or reputation of DSF.
- All understandings or contractual arrangements are entered into only with the prior approval of the DSF Chairman and Hon Secretary or if necessary, the members of the Board of Charity Trustees.

9.7 Scope

To ensure that the requirement for due diligence does not impact on operational efficiency there is a sponsorship threshold based on a range of factors listed below. Below the threshold, DSF Board approval is not required. Sponsorship agreements that meet/exceed any of the following, require Board approval.

- The sponsorship agreement applies beyond a single event or programme.
- The benefit to DSF has a value more than £5000.
- The conditions of sponsorship include any of the following; exclusivity, preferential treatment or membership wide advertising.
- The sponsorship agreement may create conflict within DSF structures and/or with existing key partners.
- Where legal constraints or ethical considerations exist, for example relating to betting, tobacco, or alcohol.
- Where the organisations aims, or operation, are, or may be perceived to be incompatible with those of DSF, or conflict with any DSF policy.

DSF will not:

- Endorse, approve, or accredit products or companies.
- Provide sponsors or partners with access to members' personal data, in line with DSF's Privacy & Data Protection Policy.

9.8 Activation

Sponsorship is activated by both parties on receipt of a signed Terms of Agreement. The Sponsorship Proposal and the Agreement will provide an overview and the detailed list of commitments/activities provided by each party. Any subsequent additional activities will need to have costs attributed and agreed by both parties. On entering a sponsorship, DSF is responsible for communicating the details of the sponsor organisation and any programme lead, team, or athlete obligations to the relevant individuals. All sponsorship associated activity will be arranged in reasonable time and full briefing notes provided to the DFS Chairman and the sponsor.

All DSF staff, representatives or athletes as brand ambassadors for sponsor and partner organisations, must represent themselves appropriately in a professional manner and not jeopardise any agreements through their behaviour, communication or endorsement of conflicting brands and/or organisations.

9.9 Cancellation

The sponsor and DSF shall have the right to withdraw from any relationship where new developments mean that aspects of this sponsorship policy are breached. Details of cancellation or termination will be set out in writing within the Terms of Agreement.

9.10 The Sponsorship Process and Associated Roles and Responsibilities

(Please refer to the flowchart in Appendix A)

- **Identify** – All DSF staff, Trustees and identified volunteers will actively identify sponsorship opportunities with the potential to benefit the work of the Organisation.
- **Assess** – The responsibility for fully researching sponsorship potential rests with the DSF Chairman.
- **Propose** – Following an assessment of suitability, the details of any agreement need to be written up and provided to the Board of Charity Trustees for assessment.
- **Approval/Sign off** – For proposals where the scope of the sponsorship agreement exceeds the threshold, the DSF Board of Charity Trustees has responsibility for approval and sign off. Where the agreement does not exceed the threshold, responsibility for approval and sign off rests with the DSF Chairman and Honorary Treasurer.
- The DSF Board of Charity Trustees will respond to any proposals within 28 calendar days. The response will take the form of one of the following:
 - An approval.
 - An outright rejection. Feedback will be provided for such rejections.
 - A request for amendments to the proposal prior to deciding.

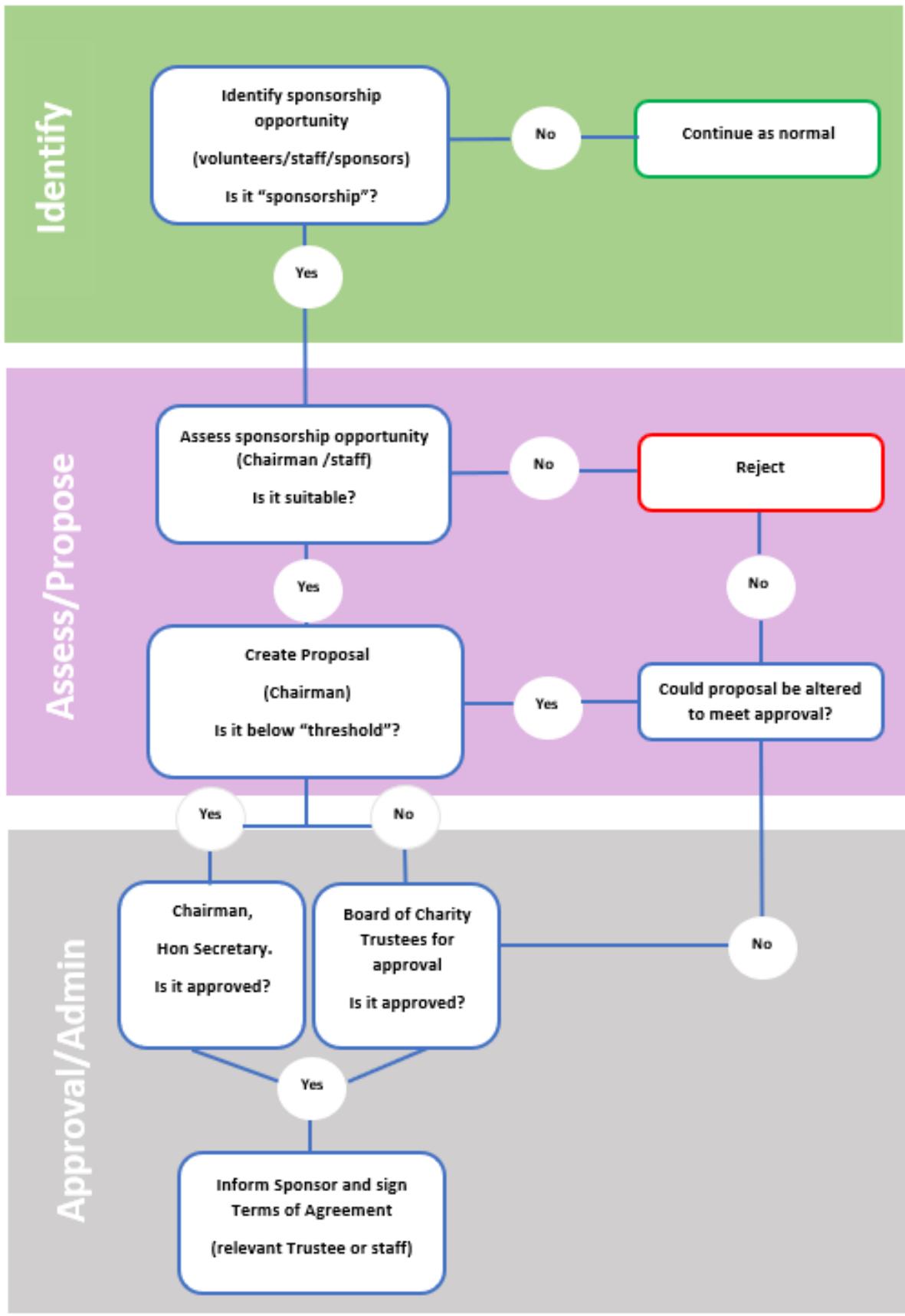
9.11 Guidelines

The following needs to be included in any proposal and provides a clear process of thought which DSF sponsors, Trustees, volunteers and staff can use when trying to identify suitable opportunities.

- What DSF hopes to gain from the sponsorship and what DSF can offer to the sponsor in return. (What is the benefit and what are the conditions)

- How DSF intends to utilise the sponsorship benefits and how much time/money/input it will take for DSF to fulfil its obligations to the sponsor conditions.
- How DSF can prove to the sponsor that any obligations have been met.
- How DSF intends for the sponsor to meet any agreements.

Appendix A



10 Disability Sport Fife (SCIO) Contact Details

Disability Sport Fife (SCIO) Policy and Procedure Documents are available to view at;

www.fifeleisure.org.uk/sports/disabilitysportfife

If you would like to receive a copy please contact us on 03451 555555 Ext 444989, email disabilitysportfife@fifeleisure.org.uk or write to us at Disability Sport Fife (SCIO), Michael Woods Sports Centre, Viewfield, Glenrothes, Fife KY6 2RD.

Any concerns or enquiries in regard to the above Policies and Procedures should be reported to Richard Brickley, OBE, MBE, DSF Chairman on mobile telephone number: 07904 371160, e-mail address: richard.brickley@fife.gov.uk