

# THE ROYAL LIFE SAVING SOCIETY

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| <b>POLICY NO:</b>        | <b>RLSS015</b>                            |
| <b>POLICY:</b>           | <b>ANTI-CORRUPTION, FRAUD AND BRIBERY</b> |
| <b>ORIGINAL POLICY:</b>  | <b>21 February 2017</b>                   |
| <b>LAST REVIEW DATE:</b> | <b>19 September 2023</b>                  |
| <b>REVIEW DATE:</b>      | <b>September 2026</b>                     |

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## 1. INTRODUCTION AND PURPOSE

The Royal Life Saving Society (RLSS) has a zero tolerance to corruption, fraud and bribery.

The RLSS shall uphold responsible and fair business practices.

The RLSS is committed to promoting and maintaining the highest standards in relation to all of its activities. Its reputation for maintaining lawful business practices, charitable status, royal patronage and financial position are of paramount importance and this Policy is designed to preserve these values.

The purpose of this policy is to assist in the prevention of corruption, fraud and bribery occurring within RLSS, and to prescribe the action to be taken in the event that corruption, fraud or bribery occurs or is alleged to have occurred.

This policy will:

- communicate the commitment of the RLSS to prevent corruption, fraud and bribery occurring within the RLSS; and
- establish clear responsibilities for the management of corruption, fraud and bribery brought to the attention of the RLSS.

## 2. DEFINITIONS

**Bribery** is inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

**Corruption** is an act undertaken with the intent to give some advantage inconsistent with official duty and the rights of others. It includes bribery, extortion, and the misuse of inside information.

**Fraud** is the act of deception deliberately practiced in order to secure unfair or unlawful gain. It extends beyond the legal definition of fraud to benefits obtained that can be both tangible and intangible. It encompasses activities and/or behaviours broader than misuse of monies.

**Unfair business practices** encompass fraud, corruption, bribery, misrepresentation, and oppressive or unconscionable acts or practices by organisations.

## 3. SCOPE AND CONTEXT

This Policy extends to all activities of the RLSS and to RLSS Directors, Trustees, staff and volunteer members of RLSS Committees and Working Groups.



This Policy will enable volunteers and staff of the RLSS to understand the risks associated with corruption, fraud and bribery and to encourage them to be vigilant and effectively recognise, prevent and report any wrongdoing, whether by themselves or others.

This Policy should be read in conjunction with other RLSS policies including:

- RLSS010 Conflict of Interest and Improper Use of Information Policy
- RLSS013 Whistle Blower Policy
- RLSS014 Risk Management Policy
- RLSS018 Complaints Handling Policy
- RLSS022 Privacy and Data Protection Policy.

## 4. POLICY STATEMENTS

### 4.1 General

- a. The RLSS regards and treats corruption, fraud and bribery seriously.
- b. The RLSS is committed to protecting its money and property from any attempt, either by members, members of the public, contractors, sub-contractors, agents, recipients, intermediaries or its own staff, to gain by deceit, financially or through other benefits.
- c. In this regard, the RLSS:
  - maintains a **'zero tolerance'** attitude towards corruption, fraud and bribery;
  - adopts a risk management approach to the prevention, detection and investigation of suspected fraudulent activity that is incorporated into its business processes, management practices, internal controls and related activities;
  - will provide adequate security for the prevention of corruption, fraud and bribery. This includes the provision of secure facilities for the storage of property, and procedures to deter corrupt activity from occurring;
  - requires that any case of suspected or detected corruption, fraud or bribery must be reported immediately to the Operations Manager or the Deputy Commonwealth President of the RLSS;
  - commits to informing RLSS personnel in ethics, privacy and fraud awareness activities; and
  - will apply appropriate sanctions against those RLSS volunteers and staff who have committed fraud.

### 4.2 Personnel (volunteers and staff) Responsibilities

The RLSS personnel (volunteers and staff) are responsible for the following actions in a manner that is reasonably practicable.

- a. Conducting their functions and duties with honesty and integrity and within relevant laws.
- b. Adhering to this Policy and other RLSS policies and guidelines that are put in place to deter and manage reports of corruption, fraud or bribery. A breach of this Policy could result in the RLSS taking disciplinary action against the offending personnel, and if required reporting the matter to an appropriate external government department, regulatory agency or the police.
- c. Exercising due care for the property that is in their control and reporting to the person to whom they report and/or the Operations Manager they are aware of in which property is at risk.
- d. Immediately advising their supervisor of any potential fraudulent or corrupt conduct of which they become aware.
- e. Reporting other personnel or third parties involved in fraud or corruption in accordance with the Policy (refer RLSS013 – Whistle Blower Policy).

### 4.3 International

- a. RLSS and its members shall not engage in any corruption, fraud or bribery that will bring RLSS into disrepute.



- b. Discouraging corruption, fraud and bribery overseas can also assist in bringing about a sustainable reduction in corrupt behaviour for the purpose of improving economic and social development.

#### 4.4 What to Report

- a. To report allegations or concerns to the person to whom they report and/or the Operations Manager that corruption, fraud or bribery occurred or is occurring, the complainant should provide in writing as much detail and information as possible. At first instance, the information should include:
  - Name/s of parties involved;
  - Name of activity;
  - Location, date and time of any specific instance(s);
  - Brief details of detected/suspected fraud or corruption; and
  - Any other relevant information.
- b. Information on the identity of someone reporting corruption, fraud or bribery is strictly confidential and will not be released without the consent of the complainant.

#### 4.5 Record keeping

All financial accounts, receipts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off the record” to facilitate or conceal improper payments.

#### 4.6 Sanctions for breach

- a. A breach of the provisions of this Policy will constitute a disciplinary offence and will be dealt with in accordance with the RLSS disciplinary procedure.
- b. Depending on the gravity of the offence, it may be treated as gross misconduct and could render the staff or volunteer liable to summary dismissal or criminal charges.
- c. As far as associated persons are concerned, a breach of this Policy could lead to the suspension or termination of any relevant contract, sub-contract or other agreement.

#### 4.7 Gifts and Hospitality

- a. In societies with a culture of ritualized gift giving, the line between acceptable and unacceptable gifts is often hard to draw and personnel connected with the RLSS should use their discretion, and if unsure contact the Operations Manager or the Deputy Commonwealth President via the RLSS Headquarters.
- b. It is not acceptable to receive, give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them.
- c. Trustees, Directors and Committee members should avoid receiving all but nominal gifts and are required to declare any gifts or hospitality to the value of GBP£50 or greater received in a 1 to 2 year period in connection with their role in the RLSS.
- d. The RLSS Operations Manager shall keep a log of any declared any gifts or hospitality to the value of GBP£50 or greater received in a 1 to 2-year period. This log will be reviewed annually by the Deputy Commonwealth President and/or Treasurer or Executive Director.

### 5. ACCESS TO THE POLICY

This policy will be available for viewing by any person on RLSS’s website or a copy will be sent upon request.

### 6. FURTHER INFORMATION

For further information or to report any suspected or detected instances of corruption, fraud or bribery that may have occurred or is occurring on any RLSS financed or related activity, please contact:



**The Royal Life Saving Society,  
Commonwealth Headquarters,**  
Red Hill House, 227 London Rd,  
Worcester WR5 2JG,  
UNITED KINGDOM

Tel: +44 (0)1905 958 444

Email: [commonwealth@rlss.org.uk](mailto:commonwealth@rlss.org.uk)

Website: <http://www.rlsscommonwealth.org>

**Attention: Deputy Commonwealth President**

