



ANTI-CORRUPTION POLICY

VI AC 001

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Anti-Corruption Policy

1.0 Introduction

- 1.1 The Volleyball Association of Ireland (VAI) t/a **Volleyball Ireland** is a publicly funded organisation and all staff 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.
- 1.2 This policy sets out VAI's standards and procedures relating to Anti-Corruption (Sports Betting) and applies to all individuals working for and representing the association which includes the VAI's Board members and all employees, contractors, consultants, and/or related personnel of the VAI acting in any capacity or activity sanctioned by the VAI.
- 1.3 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.
- 1.4 This Policy is intended to protect the reputation of sport, the Volleyball Association of Ireland and each individual acting for it. **Please note that responsibility for complying with this policy lies with all those to whom it applies.**

2.0 Sporting Integrity

- 2.1 A core function of the VAI is to maintain and be seen to be maintaining the integrity of sport.
- 2.2 The VAI 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.
- 2.3 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.
- 2.4 If you are "Directly Involved" with the sport of volleyball you cannot:
 - 2.4.1 Bet on the sport of Volleyball, anywhere in the world;
 - 2.4.2 Ask someone to bet on your behalf on the sport of Volleyball anywhere in the world;
 - 2.4.3 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 3 (Inside Information) for further information); and
 - 2.4.4 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 the VAI and the sport.
- 2.5 "Directly Involved" means working with a sport as a representative of the VAI. Defined as:
 - *All members over the age of 16*
 - *Staff (all salaried staff)*
 - *Board of Directors*
- 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

3.0 “Inside Information”

3.1 The sharing of “Inside Information” by anyone captured by this policy is specifically prohibited by the VAI.

3.1.1 “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. “

3.1.2 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.

3.2 With regard to your responsibilities under 2.4.3, 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. If in doubt, please seek further guidance from the General Manager.

4.0 Betting Integrity Officer- Roles and Responsibilities

4.1 The VAI’s Legal Board Director (to be appointed) or his/her proposed nominee is the VAI’s designated Betting Integrity Officer.

4.2 All the VAI’s staff 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 the VAI’s policies, aims and objectives; and
- advising the investigations Panel (see section 5 below)

5.0 Response Plan

5.1 It is vital that, if there is any suspicious betting activity in the VAI that action is taken.

5.2 All Staff should be aware that they must not try to deal or investigate any allegations of corrupt betting and associated activity by themselves but should immediately report the matter to Betting Integrity Officer.

5.3 All Staff must report any approach or activity which contravenes, or which may contravene this Policy. 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
- 5.4** In the event that a member of Staff is concerned that the Betting Integrity Officer is involved in suspicious betting activity outlined in section 5.3 above, this should be reported to one of the VAI's Board Members or the General Manager.
- 5.5** All Staff must co-operate with any investigation and/or request for information including the provision of documentation.
- 5.6** The Betting Integrity Officer will co-ordinate the investigation and set up an Investigations Panel. The Investigations Panel will not include any person under investigation, or any person reasonably considered to be associated with the person under investigation. In the event that the Betting Integrity Officer is under investigation the Investigations Panel will be appointed by the VAI Board of Directors. It shall be an option of the Betting Integrity Officer (or of the Board of Directors if they are called upon to appoint the Investigations Panel) to appoint a person independent to the VAI management to chair the Investigation Panel.
- 5.7** The Investigations Panel will investigate the allegation. A member of the Investigations Panel will be allocated with the responsibility for leading the investigation process.
- 5.8** The Investigations Panel should establish the facts quickly and any threat of further corrupt betting and associated activity should be removed immediately.
- 5.9** The Investigations Panel is required to:
- Act promptly in investigating the allegation and taking any action required (subject to Board 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).
- 5.10** 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. Additionally, the Investigations Panel may wish to liaise with betting operators, European/International federations, An Garda Siochana and the Sports Betting Group.
- 5.11** Depending on the nature of the fraud, the Investigations Panel may wish to contact external experts for advice.
- 5.12** The Investigations Panel must obtain the consent of The Board before contacting any of the third parties referred to in 5.9 and 5.10 above.
- 5.13** The Investigations Panel will prepare a report of its findings and recommendations to the **VAI** Board of Directors 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 the VAIs HR Director and HR Advisers - 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.

- 5.14** The Investigations Panel should liaise with the GM/Office Manager and inform them precisely of what information can be released if requested. The General Manager should retain a record of what information was released and to whom.
- 5.15** 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.

6.0 VAI Board Members

- 6.1** A separate response plan will be required for the VAI Board of Directors
- 6.2** As a Board Director, if you are concerned that a fellow Board member(s) or any employees of the VAI, including the General Manager is involved in suspicious betting activity you should inform the President, or the Vice-President, if the concern involves the President.
- 6.3** If a Board member believes that the issue cannot be considered objectively by any member of the Board of Directors or senior management, they should take their concerns to the **Sport Ireland**.
- 6.4** If a the VAI Board member feels that your concerns have not been dealt with appropriately internally or by **Sport Ireland**, 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 or An Garda Síochána, so long as you act in good faith.

7.0 Compliance

- 7.1** This policy will be reviewed annually unless circumstances dictate more frequent reviews.
- 7.2** Employees who breach this policy and procedure may be subject to disciplinary action.
- 7.3** Compliance of this policy will be monitored by the **VAI** Board of Directors.