

### **Our Ethics and Aims**

The objects of the West Midlands Sports Development CIC ("the Community Interest Company") are to carry out activities which benefit communities and in particular (without limitation) improve the health and wellbeing of socially and economically disadvantaged communities, in the region of the West Midlands.

The Community Interest Company does this by actively promoting play, sports and mindfulness activities to enable and support communities to increase physical activity, adopt heathy lifestyles and develop skills, capacities and capabilities to participate fully in society.

In particular: The Community Interest Company aims to promote and empower children, young people and families to play, learn, achieve, remain active and realise their aspirations.

## **Purpose**

The Community Interest Company is committed to the practice of responsible corporate behaviour.

Through its practices the Community Interest Company seeks to protect and promote the human rights and basic freedoms of anyone working on behalf of Community Interest Company, including directors, employed staff, volunteers and self-employed coaches (referred to throughout as colleagues).

Further, the Community Interest Company is committed to protecting the rights of all of those whose work contributes to the success of the Community Interest Company, including those colleagues as well as agents of suppliers to the Community Interest Company.

The Community Interest Company is also committed to eliminating bribery and corruption. It is essential that colleagues and persons associated with the Community Interest Company adhere to this policy and abstain from giving or receiving bribes of any form.

This policy is non-exhaustive, and all aspects of the Community Interest Company's business should be considered in the spirit of this policy.

### **Human Rights**

The Community Interest Company is vehemently opposed to the use of slavery in all forms; cruel, inhuman, or degrading punishments; and any attempt to control or reduce freedom of thought, conscience, and religion.

The Community Interest Company will ensure that all of its colleagues are entitled to their human rights as set out in the Universal Declaration of Human Rights and the Human Rights Act 1998.



The Community Interest Company will not enter into any business arrangement with any person, company or organisation which fails to uphold the human rights of its colleagues or who breach the human rights of those affected by the organisation's activities.

# Workers' Rights

The Community Interest Company is committed to complying with all relevant employment legislation and regulations. The Community Interest Company regards such regulations and legislation as the minimum rather than the recommended standard.

No colleague should be discriminated against on the basis of age, gender, race, sexual orientation, religion or beliefs, gender reassignment, marital status, or pregnancy.

All colleagues should be treated equally. Colleagues with the same experience and qualifications should receive equal pay for equal work.

No colleague should be prevented from joining or forming a staff association or trade union, nor should any colleague suffer any detriment as a result of joining, or failing to join, any such organisation.

Colleagues should be aware of the terms and conditions of their employment or engagement from the outset. In particular, colleagues must be made aware of the payment or compensation that they receive, when and how it is to be paid, the hours that they must work and any legal limit which exists for their protection, and any overtime provisions.

Colleagues should also be allowed such annual leave, sick leave, maternity / paternity leave and such other leave as is granted by legislation as a minimum. The Community Interest Company does not accept any corporal punishment, harassment in any form, or bullying in any form.

### **Environmental Issues**

The Community Interest Company is committed to keeping the environmental impact of its activities to a minimum and has established an Environmental Policy in order help achieve this aim.

As an absolute minimum, the Community Interest Company will ensure that it meets all applicable environmental laws in whichever jurisdiction it may be operating.



#### **Conflicts of Interest**

The Community Interest Company holds as fundamental to its success the trust and confidence of those with whom it deals, including clients, suppliers, and colleagues. Conflicts of interest potentially undermine the relationship of the Community Interest Company with its partners.

In order to help preserve and strengthen these relationships, the Community Interest Company has developed an Anti-Bribery and Corruption Policy, which provides rules and guidelines concerning the conduct of its colleagues aimed at minimising the possibility of conflicts of interest and avoiding risks associated with bribery and corruption.

All colleagues of the Community Interest Company are expected to act honestly and within the law.

## Information and Confidentiality

Information received by colleagues of the Community Interest Company will not be used for any personal gain, nor will it be used for any purpose beyond that for which it was given.

The Community Interest Company will at all times ensure that it complies with all applicable requirements of the Data Protection Legislation. "Data Protection Legislation" means (1) unless and until General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR") is no longer directly applicable in the UK, the GDPR and any national implementing laws, regulations, and secondary legislation (as amended from time to time) in the UK and subsequently (2) any legislation which succeeds the GDPR.

### **Grants and Funding Partners**

The Community Interest Company, and all its colleagues are committed to ensuring that no act or omission which is within their power and which would have the effect of deliberately, negligently, or recklessly misleading the funders, creditors or other investors in the Community Interest Company occurs.

## **Suppliers and Partners**

The Community Interest Company expects all suppliers and partners to work towards and uphold similar ethical and moral standards.

The Community Interest Company will investigate the ethical record of potential new suppliers before entering into any agreement. Further, the Community Interest Company reserves the right to request information from suppliers regarding the production and sources of goods supplied.



The Community Interest Company reserves the right to withdraw from any agreement or other arrangement with any supplier or partner who is found to have acted in contravention of the spirit or principles of this Ethical Policy.

## **Bribery and Corruption**

The Community Interest Company is fundamentally opposed to any acts of bribery and to the making of facilitation payments as defined by the Bribery Act 2010. Employees and any other persons associated with the Community Interest Company, such as agents, subsidiaries, and business partners, are not permitted to either offer or receive any type of bribe and/or facilitation payment.

All employees are encouraged to report any suspicion of corruption or bribery within the Community Interest Company in accordance with the Community Interest Company's Whistleblowing Policy.

Should any colleague be in doubt when receiving or issuing gifts and hospitality, they should refer to the Anti-Bribery and Corruption Policy contained within the Employee Handbook.

The Community Interest Company uses its reasonable endeavours to implement the guidance principles on bribery management that are published, from time to time, by the Secretary of State in accordance with Section 9 of the Bribery Act 2010.

If a colleague is found guilty of giving or receiving a bribe, they will be personally criminally liable and may be subject to disciplinary action.

Anyone found guilty of bribery will be responsible for bearing any related remedial costs such as losses, court fees, or expenses.

This Policy has been approved and authorised by:

Name: Anthony Maguire Position: Managing Director

Date: 16/10/2023