



## Anti-Bribery and Corruption Policy

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**Organisation:** Traditional Shotokan Karate UK (TSKUK)

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**Review Date:** 1<sup>st</sup> April 2027

### 1. Introduction

This policy outlines TSKUK's position on bribery and corruption and provides guidance on recognising, preventing and dealing with associated risks.

TSKUK is committed to operating with integrity, fairness, transparency and accountability in all activities, decisions, financial dealings and relationships.

As the National Governing Body, TSKUK expects all individuals and affiliated clubs acting on its behalf to maintain the highest standards of ethical conduct and to uphold public confidence in the integrity of Karate.

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### 2. Policy Scope

This policy applies to:

- All TSKUK officials.
- Coaches and instructors.
- Examiners.
- Referees and judges.
- Volunteers.
- Affiliated clubs.
- Any individual acting on behalf of, representing, or providing services to TSKUK.

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### 3. Policy Statement

TSKUK has a zero-tolerance approach to bribery and corruption.

We are committed to maintaining the highest standards of ethical conduct and acting professionally, fairly and with integrity in all our dealings and relationships. Bribery or corruption in any form is unacceptable and will not be tolerated.

TSKUK will comply with all applicable laws relating to bribery and corruption, including the Bribery Act 2010.

Individuals must not seek personal advantage, influence decisions improperly, or use their position within TSKUK for personal gain.

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## **4. Definitions**

### **4.1 Bribery**

Bribery means offering, promising, giving, accepting, requesting or seeking a financial or other advantage to influence the actions of a person in a position of trust or responsibility.

Examples may include:

- Offering money or gifts to secure a contract, appointment or partnership.
- Providing benefits to influence a grading, competition, disciplinary or safeguarding decision.
- Offering incentives to obtain favourable treatment or access.
- Accepting hospitality or benefits in return for preferential treatment.

### **4.2 Corruption**

Corruption includes dishonest, unethical or improper conduct designed to secure a benefit or advantage for an individual, club or organisation.

Corruption may involve abuse of position, conflicts of interest, misuse of authority, favouritism or improper influence.

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## **5. Prohibited Conduct**

It is prohibited to:

- Give, promise or offer a bribe.
- Request, agree to receive or accept a bribe.
- Make facilitation payments (unofficial payments intended to influence or expedite a routine process).
- Engage in any form of corruption, dishonest dealing or unethical conduct.
- Use TSKUK funds, resources, influence or authority for improper personal gain.
- Abuse a position of trust or authority for personal benefit.

- Seek to improperly influence any TSKUK decision through gifts, payments, favours, hospitality or other inducements.

This includes attempts to influence:

- Dan grading outcomes.
- Instructor licensing decisions.
- Examiner, referee or official appointments.
- Competition selection decisions.
- Competition results or officiating outcomes.
- Safeguarding, disciplinary or complaints decisions.
- Affiliation or membership decisions.
- Procurement or commercial decisions.
- Funding, sponsorship or partnership arrangements.

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## **6. Gifts and Hospitality**

Reasonable and proportionate hospitality or gifts may only be given or received where:

- They are modest in value.
- There is no intention to influence a decision or gain an improper advantage.
- They are openly offered and transparently handled.
- They do not create a conflict of interest or the appearance of one.

As a guide, gifts or hospitality should normally be modest in value, for example under £25 unless approved in advance by an appropriate senior officer.

Gifts, hospitality or benefits must not be accepted or offered where they could reasonably be perceived as influencing:

- A grading outcome.
- An instructor licensing decision.
- A competition selection decision.
- A competition officiating decision.
- A safeguarding, disciplinary or complaints outcome.
- A commercial or procurement decision.
- An affiliation or membership decision.
- Any other decision taken on behalf of TSKUK.

Where there is any doubt, the matter should be declared and discussed before acceptance.

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## **7. Procedures for Prevention**

### **7.1 Risk Assessment**

TSKUK will periodically review bribery and corruption risks across relevant areas including:

- Procurement and purchasing.
- Supplier and contractor arrangements.
- Funding bids and grant applications.
- Sponsorship and partnership arrangements.
- Dan grading processes.
- Instructor licensing arrangements.
- Competition selection and officiating processes.
- Affiliation and membership decisions.
- Any area where influence, authority or financial resources could be misused.

### **7.2 Due Diligence**

Reasonable checks will be undertaken on suppliers, contractors, partners, sponsors and service providers where significant financial, operational or reputational risks exist.

### **7.3 Training and Awareness**

Relevant staff, officials and volunteers will receive awareness of this policy during induction and through refresher briefings as required.

### **7.4 Conflicts of Interest**

Individuals must declare any actual, potential or perceived conflict of interest that could affect their decision-making or impartiality.

Declared conflicts may require withdrawal from decision-making processes where appropriate.

### **7.5 Reporting Concerns**

Any concerns or suspicions of bribery, corruption or improper influence must be reported immediately.

Designated Anti-Bribery Officer:

**Nathan Bond**

Email: [office@tskuk.co.uk](mailto:office@tskuk.co.uk)

Telephone: 01603 418751

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## **8. Reporting and Whistleblowing**

Concerns may be reported confidentially and without fear of reprisal.

Reports may be made to:

- A Senior Instructor.
- The Designated Anti-Bribery Officer.
- The Chief Instructor.
- An external authority, including law enforcement, where appropriate.

All concerns will be treated seriously and investigated appropriately, fairly, thoroughly and as discreetly as possible.

Any person raising a genuine concern in good faith will be treated fairly and should not suffer victimisation, retaliation or disadvantage as a result.

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## **9. Breaches and Consequences**

Breaches of this policy may result in:

- Disciplinary action up to and including removal from office, suspension or termination of role.
- Withdrawal of instructor, examiner, referee or official appointments.
- Suspension or termination of membership.
- Termination of contracts or arrangements with suppliers, contractors or partners.
- Referral to law enforcement or other relevant authorities.
- Any other action considered appropriate by TSKUK.

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## **10. Roles and Responsibilities**

### **10.1 Designated Anti-Bribery Officer**

The Designated Anti-Bribery Officer is responsible for:

- Receiving concerns raised under this policy.
- Supporting the review and investigation of reports.
- Maintaining oversight of this policy.
- Ensuring appropriate records are maintained.
- Promoting awareness of anti-bribery expectations throughout TSKUK.

### **10.2 The Chief Instructor**

The Chief Instructor is responsible for:

- Providing strategic oversight.

- Promoting a culture of integrity and transparency.
- Reviewing significant concerns where appropriate.
- Supporting effective implementation of this policy.

### **10.3 Senior Instructors**

Senior Instructors are responsible for:

- Leading by example.
- Ensuring decisions are made fairly and without improper influence.
- Addressing concerns appropriately.
- Supporting policy implementation and review.

### **10.4 Affiliated Clubs**

Affiliated clubs are responsible for:

- Complying with this policy.
- Promoting ethical conduct.
- Reporting concerns promptly.
- Cooperating with any enquiries or investigations.

### **10.5 All Staff, Volunteers and Representatives**

All individuals covered by this policy are responsible for:

- Complying with this policy.
- Avoiding conduct that could amount to bribery, corruption or improper influence.
- Declaring conflicts of interest where relevant.
- Reporting concerns promptly.

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## **11. Monitoring and Review**

This policy will be reviewed annually or sooner if:

- There are changes in legislation or guidance.
- A relevant incident, allegation or investigation occurs.
- Operational learning indicates improvements are required.

The Designated Anti-Bribery Officer will maintain oversight of this policy and any associated records, investigations, training and awareness arrangements.