

**EVERY PARENT & CHILD**

**FRAUD, BRIBERY, GIFTS, HOSPITALITY & EXPENSES POLICY**

## **CONTENTS**

### **1. INTRODUCTION**

**Who is covered by the Policy?**

**Non Compliance**

### **2. BRIBERY**

**Introduction**

**The law**

**Definitions**

**Policy statement**

**Employee responsibility**

### **3. FRAUD**

**Definition**

**Employee Responsibility**

**Reporting procedures**

**Protection of Whistle-blowers**

**Investigations and resulting action**

### **4. GIFTS AND HOSPITALITY**

**Business gifts and hospitality**

**Other gifts and hospitality**

### **5. EXPENSES**

**Definition of expenses**

**Approval of expenses**

**Travel Expenses**

**Overnight stays**

**Small expenses**

**Representation expenses**

## **1. INTRODUCTION**

1.1. The purpose of this policy is to outline the principles followed by Every Parent & Child (EPC) concerning:

- fraud or suspected fraud
- bribery or suspected bribery
- acceptance of gifts, rewards and hospitality
- expenses incurred in carrying out duties on the charity's behalf

### **Who is covered by the Policy?**

1.2. This policy applies to all individuals working for the Charity, volunteers and any contractors, consultants and vendors doing business with EPC or other persons acting under or on behalf of the Charity.

### **Non Compliance**

1.3. Failure to observe Charity policy by individuals or volunteers working for EPC may lead to disciplinary action in accordance with the charity's disciplinary policy.

1.4. In the event of a breach of the policy by other organisations, or individuals, the Charity will take appropriate action.

## 2. BRIBERY

### Introduction

2.1. EPC is committed to implementing and enforcing effective systems to counter bribery. Therefore, it is EPC's policy to conduct all aspects of its business in an honest and ethical manner at all times.

### The Law

2.2. Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to ten years imprisonment. If the Charity is found to have taken part in the corruption or lacks adequate procedures to prevent Bribery, it could face an unlimited fine and be excluded from tendering for Government contracts.

### Definitions

2.3. **Bribe** is a financial or other advantage offered or given to anyone to persuade them to or reward them for performing their duties improperly, or, with the intention of influencing them in the performance of their duties.

2.4. **Hospitality** is the practice of being hospitable, this includes the reception and entertainment of guests / visitors.

2.5. **Kickbacks** or **facilitation payments** are typically small payments made in return for a business favour or advantage.

### Policy Statement

2.6. The Charity will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.

- Provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of their duties.
- Make, or accept “kickbacks” of any kind.

2.7. The Charity will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

### **Employee Responsibility**

2.8. Employees must not:

- Accept any financial or other reward from any person in return for providing some favour.
- Request a financial or other reward from any person in return for providing some favour.
- Offer any financial or other reward from any person in return for providing some favour.

## **3. FRAUD**

### **Definition**

3.1. Fraud is an intentional act of deceit to obtain or attempt to obtain an unjust or illegal advantage, for example to make a gain (financial or otherwise), to avoid an obligation or to cause loss to another party.

3.2. For the purposes of the anti-fraud policy, the term 'fraud' includes attempted fraud.

3.3. For the purposes of this Policy fraud includes, but is not limited to, the following examples:

- Theft, misappropriation or unauthorised use of EPC time, funds, property or other assets.
- Accepting or offering kickbacks or bribes for preferential treatment, for example in the supplier-selecting or work-allocation processes;
- Deliberately creating or manipulating false or misleading financial or non-financial information or records. This includes forging or altering financial or non-financial information or records, or concealing material financial or non-financial facts (for example submission of a false CV), or
- Knowingly submitting fraudulent receipt or falsifying an expense report.

### **Employee Responsibility**

3.4. All parties to whom this Policy applies have a responsibility to assist in the prevention and detection of fraud perpetrated against EPC by:

- Operating and monitoring the systems of internal controls which promote the prevention of fraud;
- Detection, including being alert to the possibility that unusual events or transactions could be indicators of fraud;
- Assisting in the investigation of fraud;
- Management of fraud risk; and

- Reporting all suspicions of fraud and situations that could allow a fraud to be perpetrated.

3.5. The Chief Executive Officer retains ultimate responsibility for the anti-fraud framework within the charity.

### **Reporting Procedures**

3.6. Concerns should be raised directly with your Line Manager; in the event you are not comfortable to report to this person you should report to any member of Senior Management.

3.7. Do not discuss the matter with your colleagues or other parties, do not investigate the matter yourself and do not confront the individual.

### **Protection of Whistle-blowers**

3.8. EPC is committed to ensuring that all parties to whom this policy applies can raise a concern relating to fraud or suspicions of fraud without fear of victimisation.

3.9. Where reports are made in good faith, EPC will ensure as far as possible that employees or others who make them may do so without fear of any adverse consequences.

3.10. Where allegations are clearly false or made with malicious intent, the person(s) responsible for making such allegations may be subjected to disciplinary or other appropriate action.

### **Investigations and resulting action**

3.11. EPC commits to investigate all frauds that are discovered or suspected. Every case of attempted, suspected or proven fraud will be thoroughly investigated. Cases will be dealt with appropriately without regard to the position held or length of service of the individual(s) concerned, or their relation to EPC.

## **GIFTS AND HOSPITALITY**

### **Business gifts and hospitality**

3.12. This policy does not prohibit giving and receiving promotional gifts of low value or normal and appropriate hospitality.

3.13. Receiving business gifts:

- Receiving promotional gifts of low value is normal and appropriate: however, gifts with a value exceeding £25.00 may not be accepted without approval. Any gift offered and then refused because of its value must be reported to the charity.
- In such cases staff could suggest to the client that they could instead donate their gift (if non-perishable) for a future EPC raffle.

3.14. Offering business gifts - Business gifts are primarily aimed at thanking customers and suppliers for their custom and loyalty, only authorised gifts may be given.

3.15. Receiving hospitality - The acceptance of corporate hospitality must be transparent; all invitations must be reported to the charity before an employee accepts any invitation. The following areas are exempt while attending conferences, seminars, sponsored by third parties:

- business and travel expenses incurred
- normal business lunches and meals

3.16. Offering gifts and hospitality - Charity hospitality is primarily aimed at thanking customers and suppliers for their custom and loyalty. All hospitality events must have approval.

3.17. Donations to organisations - No donations should be made to charities, political parties or other organisations without approval.



## **Other gifts and hospitality**

3.18. Whilst we are aware that some people may want to show their appreciation, staff and volunteers must not appear to have been influenced or to have a conflict of interests.

3.19. Staff must not accept or attempt to procure any gift, reward, hospitality or concession from any member of the public or organisation with whom they are brought into contact by reason of their duties.

3.20. The only exceptions to this rule are:

- small, inexpensive or seasonal personal gifts;
- gifts that can be shared;
- concessions available to ordinary members of the public or because of membership of a national association;
- conventional hospitality, for example, modest refreshments, or a meal on an isolated occasion.

3.21. Any cash/cheques/gift vouchers received must be receipted as donations to EPC.

3.22. Any other gifts received that fall outside the above exceptions will be returned with a letter of explanation and a copy of this procedure. If it is not practical or sensitive to return gifts received, then they will be used for fund-raising purposes or social activities within EPC.

3.23. Any doubts about the propriety of accepting any gifts, rewards, hospitality, concessions, or anything not covered within this document should be referred to the line manager. If the matter is not resolved it should be referred to the Chief Executive.

3.24. The acceptance of gifts or hospitality that fall outside these exceptions will be considered a disciplinary matter.

## **4. EXPENSES**

### **Definition of expenses**

4.1. Expenses in the scope of this policy are such expenses that an employee incurs in the interest of EPC. Employees and volunteers are required to keep their expenses as low as possible and within the framework of this policy. Expenses, which are not necessary for the carrying out of tasks given by EPC or that have not been authorised in advance (where prior authorization is required) will be borne by the employees and volunteers themselves.

4.2. EPC will refund the following types of expenses:

- (i) Travel expenses
- (ii) Expenses for overnight stays
- (iii) Representation expenses
- (iv) Small expenses

### **Approval of expenses**

4.3. Expenses must be approved by an employee authorised to do so by the Line Manager, or Finance and HR Manager, or Chief Executive Officer according to EPC's organisational chart. The Chief Executive Officer submits their expenses directly to the Finance & HR Manager.

### **Reimbursement of expenses**

4.4. All expenses incurred have to be filed with supporting documents. Supporting documents are: original receipts, receipted bills, sales slips, credit card statements and tickets.

4.5. Expenses filed without the original receipt have to be borne by the employees themselves unless an exception is granted by the Line Manager or Finance and HR Manager.

4.6. All cash and allowance expenses shall be entered into the Petty Cash Expense voucher and signed off by an authorised employee within 60 days after returning from the expenses being incurred; no refund will be given thereafter.

## Travel Expenses

4.7. Public transport should be used wherever possible. When it is not practical to use public transport, or where more than one employee or volunteer is travelling the same journey, then a mileage allowance will be paid. Paid employees are not permitted to claim travel expenses from their home to their normal place of work.

4.8. **Train Travel** - All employees must use economy class tickets.

4.9. **Aeroplane** - Travel by aeroplane is refundable if it is more economical than other form of transport. Employees must use economy class tickets. This has to be approved by line manager in advance.

4.10. **Private car** - Car mileage will be reimbursed in line with rates set by HMRC. This is currently 0.45p per mile for the first 10,000 miles per annum, and then 0.25p per mile for paid workers. Motorcycles are reimbursed at 24p per mile and bicycles at 20p per mile.

Volunteers can claim 0.35p per mile when using a personal car.

4.11. If you intend to use your private vehicle in connection with official EPC business you are required to ensure that your vehicle is in a suitable condition and you have the correct tax and insurance.

4.12. **Parking** – Parking costs will be refunded against original tickets. Any parking fines incurred will be borne by employee/volunteers.

4.13. **Taxis** - The cost of travelling by taxi will only be refunded if it saves a significant amount of time, money or if no suitable public transportation is available. This has to be approved by line manager in advance.

4.14. **Specific Volunteer Expenses:** Volunteers can claim 0.35p per mile when using a personal car to travel to the EPC office or another location as agreed with the Volunteer Co-ordinator.

Volunteers can claim up to £5 for lunch when working 5 hours or more. Appropriate receipts MUST be submitted with the expenses claim form.

## **Overnight stays**

4.15. EPC covers the expenses for overnight stays e.g. hotel or bed and breakfast provided that there is funding for this.

4.16. Hotel expenses are refunded against presentation of the original invoice. It is the employee's responsibility to make sure that the hotel provides an invoice before checking out. In general the invoice should be addressed to the respective EPC entity. Potential private expenses (such as minibar, in-room-dining, private telephones, in-room-video and so on) have to be borne by the employees themselves.

## **Representation expenses**

4.17. In the light of client care and the socializing duties of employees it may be in the interests of EPC that employees invite clients and business partners. The corresponding expenses always need to be covered by business interest. When choosing the locality, the commercial importance of such a client and business relationship needs to be taken into account and should also be in line with the local customs. The actual costs will be reimbursed against original receipts.

## **Small expenses**

4.18. The following exemplary items are considered as small expenses in the context of this expense policy:

- Gifts, given to staff and volunteers, such as flowers and beverages
- Business phone calls from the private line
- Small expenses at meetings
- Postage

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