

# Code of Conduct

<b>Version number</b>	V26.0
<b>Policy owner</b>	Director of People & Culture
<b>Policy manager</b>	Head of HR
<b>Approval level</b>	Board of Trustees
<b>Effective date</b>	September 2022
<b>Next review date</b>	February 2023
<b>Document control</b>	Open

# Contents

<b>1 Introduction .....</b>	<b>3</b>
<b>2 Regulatory and legal requirements .....</b>	<b>3</b>
<b>3 Background.....</b>	<b>3</b>
<b>4 Objective .....</b>	<b>3</b>
<b>5 Scope.....</b>	<b>3</b>
<i>5.1 Trustees .....</i>	<i>4</i>
<b>6 Business ethics.....</b>	<b>4</b>
<b>7 Senior Managers and Certification Regime .....</b>	<b>4</b>
<b>8 Fraudulent activities.....</b>	<b>5</b>
<b>9 Confidential information .....</b>	<b>5</b>
<b>10 Adherence to policies and procedures .....</b>	<b>6</b>
<b>11 Facilities .....</b>	<b>6</b>
<b>12 Improper payments .....</b>	<b>6</b>
<b>13 Bribery and corruption .....</b>	<b>6</b>
<b>14 Gifts and hospitality .....</b>	<b>7</b>
<i>14.1 Prizes .....</i>	<i>8</i>
<i>14.2 Hospitality.....</i>	<i>9</i>
<b>15 Political payments / contributions .....</b>	<b>9</b>
<b>16 Conflicts of interest .....</b>	<b>10</b>
<b>17 Intellectual property .....</b>	<b>10</b>
<b>18 Communicating about our charity.....</b>	<b>11</b>
<b>19 Professionalism.....</b>	<b>11</b>
<i>19.1 Dress, appearance and personal hygiene.....</i>	<i>11</i>
<i>19.2 Alcohol, drugs and smoking .....</i>	<i>12</i>
<i>19.3 Attendance.....</i>	<i>12</i>
<i>19.4 Conduct outside work.....</i>	<i>12</i>
<i>19.5 The use of social networking websites, applications or websites that require a virtual presence .....</i>	<i>13</i>
<b>20 Roles, responsibilities and governance .....</b>	<b>13</b>
<b>21 Non-compliance/breaches and escalation routes .....</b>	<b>13</b>
<i>21.1 Employees .....</i>	<i>13</i>
<i>21.2 Contractors.....</i>	<i>13</i>
<b>22 Monitoring and assurance .....</b>	<b>14</b>
<b>23 Information and communication .....</b>	<b>14</b>
<b>24 Related documentation .....</b>	<b>14</b>
<b>25 Document control.....</b>	<b>14</b>

# 1 Introduction

During your employment, or working for the charity as a contractor, you represent our charity. You should act in our best interests at all times and, whilst you are at work, devote the whole of your time, ability and attention to the performance of your duties. The standard of conduct expected is one that promotes good relations in line with our mission and values with colleagues, our clients and creditors which encourages efficient and safe performance of work and good working relations.

We are proud of our reputation as a professional charity with a commitment to high standards. Our success is a direct result of the commitment shown by you, which is why we consider you as our key resource. However, to achieve future success it is essential that integrity and quality of service to clients and colleagues is sustained.

## 2 Regulatory and legal requirements

Senior Managers & Certification Regime

Political Parties, Elections & Referendums Act 2000

Smokefree (Premises & enforcement) Regulations 2006

Bribery Act 2010

## 3 Background

This Code of Conduct sets out the standards on which we base the conduct of our business. While no written code can be a substitute for personal integrity, these standards provide the ethical basis on which we operate and sets out the standards that are required of you.

## 4 Objective

To clearly set out standards and expectations of conduct required by all our colleagues whilst undertaking their duties for the charity.

## 5 Scope

All of our employees, contractors and trustees must be familiar with this Code of Conduct and also the Senior Managers & Certification Policy, which outlines at section 6.5 the specific SM&CR requirements and conduct rules.

/ We want to create a society free from problem debt

For employees, this document forms part of your contract of employment.

You should note that this code sets out the standards of conduct expected of you, however its content is not exhaustive. It is expected that you will adopt a common-sense approach in relation to your conduct at/or relating to work. This also means, you are expected to familiarise yourself with and adhere to our policies, processes, and procedures.

## 5.1 Trustees

The gifts & hospitality section of this Code of Conduct will apply to all trustees during their tenure with the charity. It will only apply to gifts & hospitality received in relation to the work they undertake for the charity.

## 6 Business ethics

It is our policy that our business is conducted in a lawful and ethical manner. We do not wish to obtain business that compromises our standards in any way.

Our policy requires that you refrain from any action or activity, whether inside or outside work, that creates or gives the impression of creating a conflict between your interests and ours. All employees and contractors have a duty to act at all times in a manner that will best promote our interests.

## 7 Senior Managers and Certification Regime

The Senior Managers and Certification Regime (SM&CR) replaced the FCA's Approved Persons Regime on 9<sup>th</sup> December 2019, raising standards of conduct for all individuals working in a regulated financial services environment. The overall aim of the SM&CR is to reduce harm to consumers and strengthen market integrity by making senior individuals more accountable for their conduct, decisions and competence.

You should familiarise yourself with the conduct rules which are outlined in section 6.5 of the SM&CR Policy. Subsequent sections of this policy encompass some potential examples of these.

StepChange is committed to embedding SM&CR and promoting a healthy culture, thereby maintaining the highest standards of honesty, openness and accountability. In order to achieve this, all colleagues must take personal responsibility to, and ensure that other colleagues:

- Act with integrity
- Act with due skill, care and diligence
- Pay due regard to the interests of customers and treat them fairly.

Where there is an alleged failure of a colleague to adhere to any, or all, of these standards, initiation of the disciplinary procedure is likely. Where it is deemed that there has been an actual breach, we have an obligation to inform the FCA. The timing of notification and the level of detail provided, will be dependent on the circumstances and the nature of the role. Further detail is provided in section 6.5 of the Senior Managers and Certification Regime policy.

## 8 Fraudulent activities

Our policy is to comply with all applicable laws and regulations and for all employees and contractors to act honestly at all times.

If you have any suspicions that a fraudulent or dishonest activity may be taking place you must inform your line manager immediately. If they are unavailable, you should notify an alternative line manager or member of the human resources team. They will investigate all such activities and take any action deemed appropriate. Failure to notify your line manager or a suitable alternative person when you are aware of (potential) fraudulent activity may lead to disciplinary action.

Matters that may be considered to be or lead to a fraudulent activity, which must be reported immediately, include:

- The use of our assets for any unlawful purpose or unauthorised personal benefit
- Failure to record or disclose any fund or asset – all assets, liabilities, revenues, expenses and financial transactions must be properly recorded on the corporate books of account
- Payments made on our behalf that are not approved or are not made for the purpose described on the supporting documentation.
- Conducting business other than that of ours on our premises. For example you running your own business.

The above list is not exhaustive; there will be other matters that will fall within this category.

Fraud prevention databases have been established for the purpose of allowing employers to share data on their employment fraud cases.

Should our investigations identify fraud or the commission of any other criminal offence by you when applying for, or during the course of your employment with us, we will record the details of this on the relevant fraud prevention databases. This information may be accessed from the UK and other countries and used by law enforcement agencies and by us and other organisations to prevent fraud.

Please contact the HR Department if you want to receive details of the relevant fraud prevention databases through which we share information.

## 9 Confidential information

Confidential information means any information or matter which is not in the public domain and which relates to the affairs of the charity or any of its clients. This would include contracts, copyrights, accounting and payroll records systems documentation and clients' names, addresses and financial records.

You must not use or disclose to any person or organisation either during or at any time after your employment with the charity any confidential information. This restriction does not apply to:

- Prevent you from making a protected disclosure or
- Disclosure that has been authorised by the charity or is required by law.

Breach of confidentiality is considered to be gross misconduct (a material breach of contract for contractors) and may result in dismissal without notice, even on the first offence. The Confidentiality Policy and Procedure explains further expectations of this nature. Any questions about whether information is confidential should be directed to your line manager.

## 10 Adherence to policies and procedures

You should ensure you are familiar with and comply with all charity policies and procedures as well as any documented processes outlined for your role as instances of non-adherence could constitute a breach of the Code of Conduct. Should you have any doubt about which processes apply to you in your role, please speak with your line manager.

## 11 Facilities

Our facilities are to be used for our business and for no other purpose. No private work may be carried out in our name, or in our premises or with the use of our equipment. You should also refrain from distributing information relating to external interests/work without prior consent from your line manager. Similarly, and as outlined in the Acceptable Use (previously Email, Internet and Social Media) Policy, it is provided for the purposes of charity business. Such access is not therefore, provided as a colleague right, personal e-mail and internet usage must be kept to reasonable and appropriate limits and there should be no expectation of privacy in the use of charity email and intranet facilities, whether for charity business or personal use.

## 12 Improper payments

We operate in a legal and proper way in our business dealings and you are required to behave similarly. Our funds and assets must not be used directly or indirectly for political contribution or illegal payments of any kind (e.g. the payment of bribes, including those to retain business or secure new business). Similarly, you must not accept any potentially improper payments.

## 13 Bribery and corruption

The charity takes a zero-tolerance approach to bribery and corruption. A bribe is an inducement or reward offered, promised or provided in order to gain any contractual, regulatory or personal advantage. It is not acceptable for you (or someone on your behalf) to:-

- 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;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to facilitate or expedite a routine procedure;
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;

- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return; or
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy.

This does not however prohibit normal and appropriate hospitality (given or received) to or from third parties (see section 14 below).

## 14 Gifts and hospitality

In the normal course of business you may be offered gifts and hospitality. As a charity, we need to be able to demonstrate that we're behaving with honesty and integrity and leading by example with fairness and transparency. You may accept gifts that have only a small value, such as business diaries, calendars or other items considered to be of token value (under £25). Similarly, an occasional meal or other event would be acceptable, within the guidelines of this policy, as moderate hospitality that is an accepted courtesy of a business relationship. However, you should not allow yourself to reach a position where the gift or hospitality could be considered a factor in influencing a business decision, nor must you borrow from or lend money to anyone with whom we have business dealings.

The following guidance is intended to provide some clarity around this, however, if you are not sure whether you may accept a gift or hospitality, you should seek advice from the Director of Risk & Compliance or their nominated deputy (a member of the Group Risk Team).

You are responsible for ensuring that you notify Group Risk, and in the required circumstances, hand in any gifts or hospitality to them that you receive in the course of your work at the charity.

You are responsible for ensuring that you comply with the policy and for providing reasonable assurance to your manager and the Director of Risk & Compliance, or nominee, that you are compliant with the policy. You need to:

- notify Group Risk if a gift value is over £25
- notify Group Risk if hospitality received value is over £25
- notify Group Risk of gifts or hospitality given to any external organisation
- notify Group Risk of all instances where gifts or hospitality have been offered and declined.

If you need to report any gifts or hospitality given or received, please complete the form in Appendix B and send to [risk.management@stepchange.org](mailto:risk.management@stepchange.org).

In the absence of the Director of Risk & Compliance, a Group Risk Analyst is nominated to give advice on matters relating to gifts & hospitality.

You should exercise caution when accepting a gift, although it is recognised that there are circumstances in which it would be impractical or potentially offensive to refuse. However, if gifts are received the following applies:

- All gifts with an estimated value of under £50 may be retained by you but must be recorded by emailing a completed gifts & hospitality form to the Group RiskTeam inbox, unless they are of token value (under £25).

- Monetary gifts must not be accepted, respectfully declined and the offer returned if necessary. You may accept redeemable vouchers, however the voucher must be redeemed for suitable items that can be shared with your team, for example – sweets, chocolates or savoury food items. If several vouchers are received with an aggregated value of more than £25, you must declare this to the Director of Compliance or their nominee.
- any gift received that has an estimated value of £50 or more must be given to the Director of Risk & Compliance or nominee, who will make suitable arrangements for its use within the charity or for charitable purposes or for its disposal.
- If a gift value is over £50 but is to be shared between a team and thereby reducing the value to less than £25 or between £26-£50, the gift should still be notified but may not need to be handed in to the Director of Risk & Compliance or nominee
- If a gift, or hospitality value is over £50, pre-approval should be sought from the Chief Executive Officer. The gift should still be notified but may not need to be handed in to the Director of Risk & Compliance or their nominee
- Should the CEO be offered a gift or receive hospitality of over £250, pre-approval should be sought from the Chairman of the Board of Trustees. The gift should still be notified but may not need to be handed into the Director of Risk & Compliance or their nominee.
- Hospitality includes the offer of payment for travel and/or accommodation to attend conferences or events whether simply attending or speaking.

The table below sets out the position with regard to recording, declaring and surrendering gifts.

<b>Value of gift/hospitality</b>	<b>Record</b>	<b>Hand in to a Risk &amp; Compliance team member</b>
Token value (up to £25)	No	No
Between £26 and £50	Yes	No
More than £50	Yes	Yes
More than £50	Yes	Yes, pre-approval must be sought from the Chief Executive Officer.
CEO receiving gift/hospitality of more than £250	Yes	Yes, pre-approval must be sought from the Chairman of the Board of Trustees.
Monetary gifts	Yes	Yes (Must not be accepted. You must record the fact that it was offered and declined.)

## 14.1 Prizes

There may be occasions when you enter or are entered into competitions at events which you attend in your role as a charity employee or contractor, or by virtue of your employment at the charity. In some circumstances, if a prize is won, these may be indistinguishable from gifts and could be perceived as potential bribes. Accordingly, the above guidelines will apply.

In general, if you win a prize at an event outside the charity and this is related to your employment, the prize must be recorded, unless it is of a token value of less than £25. Prizes with an estimated value of £50 or more must be surrendered. If prizes are awarded in other circumstances, the Director of Risk & Compliance or their nominee should be consulted for a decision on whether it would be appropriate for the employee to retain the prize.



## 14.2 Hospitality

Interaction with regulated firms, professional advisers and other interested parties including suppliers or potential suppliers is an important part of the charity's work. Hospitality may be offered by them as part of that interaction and would therefore be acceptable. It is important, however, that the charity can defend itself against any possible suggestions of undue influence.

The maximum value of hospitality that can be accepted without prior approval from the CEO is £150 subject to the rules above.

If hospitality is offered to more than one charity colleague at the same time (for example, an entire team attending an evening meal offered by a supplier or charity partner) the maximum aggregated value that can be accepted is also £150 without prior approval from the CEO.

The following table provides guidance of what is permissible and whether it is recordable. It does not attempt to cover every situation and must be interpreted by applying common sense to the particular circumstances of each case. If you are unsure, you should speak to your manager or contact the Director of Risk & Compliance or a member of the Group Risk team.

<b>Type of hospitality</b>	<b>Venue</b>	<b>Permissible value within guidelines</b>	<b>Record – to include details of the hospitality received and the organisation giving it</b>
Working breakfast or lunch	Charity premises or any third party's office	Yes	No
Working breakfast or lunch	Any restaurant or other venue away from the premises	Yes	Yes
Drinks reception or similar networking opportunity	Any venue away from office premises	Yes	Yes
An evening meal	Any venue away from office premises	Yes	Yes

## 15 Political payments / contributions

The law relating to corporate contributions (i.e. this policy only relates to payments or contributions from the charity – it does not relate to what you choose to do as an individual which is a matter for you) to political activities or people is very complex and full of pitfalls. Furthermore, political activity from our charity (whether by participation in or donation to political activity) can lead to others making unfavourable judgements about us. As a result, it is against our policy to:

- Make any political contribution or expenditure of any nature (including things like the purchase of tickets to political dinners, advertisements on behalf of candidates, donations of corporate property, services or employees and payments to the media meant to influence individual decisions) without first obtaining approval from the Chief Executive.
- Encourage individual employees to make any such contributions or expenditures.

## 16 Conflicts of interest

In the interests of our success and our relationships with clients and creditors, you must not put yourself in a position where your personal interests' conflict with our business interests or your ability to carry out your duties is compromised. This could include:

- You should not have any interest, either directly or indirectly, financially or otherwise, in any person or company with which we have commercial relations (including suppliers and clients) which may be detrimental to our best interests (although this does not apply to investment holdings of 5% or less of the voting shares in any company listed on a recognised Stock Exchange). Any such interests should be declared to your line manager so a decision can be made as to its appropriateness.
- You must not be involved in outside employment or political activities, which affects your ability to do your job. You must consult your line manager before you make any commitment to become involved in any such activities. You must tell your line manager of any relevant outside activities within the first month of joining our charity; failure to do so will be investigated in line with the Disciplinary Policy and Procedure.
- You will be in breach of the terms of your employment/contractor status if you become involved in any business activity which competes with our business while you are an employee/contractor of the charity, either on your own account or by working for a competitor. Any such involvement could be regarded as an act of gross misconduct that may result in dismissal without notice.
- If you try to persuade our clients to transfer their business when you leave us, legal action will be taken to protect our business interests.
- Where personal relationships (e.g. - a family relationship, a business / commercial / financial relationship or an intimate / romantic relationship) overlaps with working relationships and could therefore lead to acts of impropriety, bias, abuse of authority or conflict of interest.

Employees/contractors should declare in confidence to Human Resources/line manager respectively any personal relationships which may give rise to a real or perceived conflict of interest, trust or breach of confidentiality. Human Resources will liaise with the line manager to ensure any required actions are taken to minimise the opportunity for any concerns those relationships may lead to. In the case of contractors, the line manager will be expected to consider any impact on the scope of the contractor's duties and tenure and alert the head of department so that this can be further assessed.

## 17 Intellectual property

In the course of your employment/contractor relationship with us, you may produce new ideas etc that will be of commercial benefit to the organisation. We depend on this creativity to stay competitive and will therefore take steps to ensure that there is no unauthorised exploitation of these.

As an employee/contractor any copyright, design right or other intellectual property rights (including moral rights) in any material or invention that you create will automatically on creation become the property of the charity, unless explicitly stated otherwise. Where they do not automatically become the property then you will hold them on trust for the charity and agree to promptly complete and deliver all documents that may be necessary to ensure they become the property of the charity.

You should always inform the Financial Controller of anything that might require formal protection under the patent, copyright; design and trade mark legislation and cooperate in any registration process. You must do this and execute all such documents as we may require from time to time at our cost, both during and after your employment, to protect all the intellectual property rights in the charity.

However, it is recognised that in some cases, we may gain a significant commercial benefit from a new idea and this special contribution may be recognised, at our absolute discretion, by some personal reward.

## 18 Communicating about our charity

Whilst we encourage you to accept invitations to speak or write about us because this provides useful experience for you and valuable publicity for us: any speeches or articles must be agreed with the Head of Media beforehand to check that what you propose to say or write can be publicly disclosed, since some information may be commercially sensitive.

You must not make any comment to, or answer questions from, the press or media concerning us or our business interests without the prior written consent of the Head of Media.

This Code applies to communications both inside and outside the working environment, this may include:

- In public places such as discussing sensitive information on public transport
- Through communication with friends or family – such as discussing long term charity plans about future developments which may then be inadvertently shared with others
- Through participation on social networking sites.

Breaches of the Code within activities such as these may lead to investigations in line with the Disciplinary Policy and Procedure if it is deemed that this communication may negatively impact us or our clients, creditors or your work colleagues, or if it has breached legislation.

## 19 Professionalism

### 19.1 Dress, appearance and personal hygiene

We recognise and embrace the diversity, including cultures and religions, of our employees and will take a sensitive approach where this affects dress and appearance requirements. However, priority will be given to health and safety, security and other similar considerations.

***You should dress for your day in appropriate clothing, being particularly mindful when engaging in face to face contact with*** clients, creditors or other external third parties

/ We want to create a society free from problem debt

Where your appearance, personal hygiene or clothing is, in the view of your line manager, unacceptable, then this should be addressed without delay.

## 19.2 Alcohol, drugs and smoking

### **Alcohol**

In order to promote a professional environment in which health and safety are prioritised and strong performance is facilitated we require you to arrive at work free from the effects of alcohol or non-prescribed drugs. The consumption of alcohol is forbidden during working hours, as well as lunch and break times.

When you are externally entertaining or being entertained during working hours, the consumption of alcohol is prohibited – this includes attending lunch events. The consumption of alcohol at events outside of working hours (in the evening or at weekends) where you are attending as a StepChange colleague should be reasonable and with the overriding principle of ensuring that your behaviour continues to be appropriate and aligned with our values. Instances where behaviour is inappropriate at such events may result in action being taken in accordance with our Disciplinary Policy. Should you choose to consume alcohol at such an event then you should not drive home and should take responsibility for making arrangements to ensure you get home safely.

### **Drugs**

You should not be in possession of non-prescribed drugs whilst at work or misuse drugs while on duty.

### **Smoking**

A smoking ban in all offices and workplaces was introduced by the Government on the 1<sup>st</sup> July, 2007. Under this legislation all offices and work areas are designated smoke-free with adequate signage to inform employees, contractors and visitors of the no smoking status of the building. The use of electronic cigarettes is also banned in all offices.

Smoking, vaping or the use of other electronic cigarettes will only be allowed outside office premises, away from the entrances to the premises and will only be allowed during official break periods. Smoking is permitted in designated areas outside of our premises, and appropriate receptacles will be provided for the disposal of cigarette ends and other waste smoking materials. Your Line Manager can confirm the location of the designated area for your location. Breaches of this policy will be subject to the normal Disciplinary Policy and Procedure.

## 19.3 Attendance

Colleagues are expected to maintain satisfactory levels of attendance. The charity sets out its approach to how it will manage absences which are deemed to be of concern in its Improving Attendance Policy.

## 19.4 Conduct outside work

Generally, what you do outside work is your own concern, but you should avoid doing anything that might adversely affect our reputation, bring us into disrepute or in any way affect your ability to perform your duties. For the avoidance of doubt this also includes your use of social media and networking sites.

/ We want to create a society free from problem debt

When attending social occasions organised by StepChange, you will be expected to behave and display the same behaviours as if you were in the work environment and in line with our mission and value statements. Any breach of these standards whilst at a StepChange social event, for example: improper conduct or other unacceptable behaviour will be considered serious, fully investigated and could lead to disciplinary action up to and including your dismissal.

## 19.5 The use of social networking websites, applications or websites that require a virtual presence

While we do not discourage the use of these sites it is important that colleagues remember that at all times they are representatives of the charity and are expected to conduct themselves accordingly. Consequently, colleagues are expected to comply with our Acceptable Use (previously Email, Internet and Social Media) Policy regarding the use of these technologies.

Comments posted anywhere online that could be considered unprofessional or damaging to StepChange or to any client or partner with whom we deal may trigger an investigation under our Disciplinary Policy and Procedure.

## 20 Roles, responsibilities and governance

Individual roles, responsibilities and governance arrangements are outlined in individual sections of this policy.

## 21 Non-compliance/breaches and escalation routes

### 21.1 Employees

If any of the standards laid out in this code are breached, the matter will be considered serious and a disciplinary investigation will take place which could lead to formal disciplinary action. Depending upon the severity of the offence, one potential outcome could be (summary) dismissal. In some circumstances (for example, where the charity has suffered financial loss as the consequence of an employee's conduct), the charity may take civil action against an employee. For this reason, adhering to the code is an essential requirement.

Breaches of the Conduct Rules will also be reported to the Financial Conduct Authority (FCA). Details of how and when the notification will be made are provided in section 6.5 of the Senior Managers & Certification Regime policy.

### 21.2 Contractors

If any of the standards laid out in this code are breached, the matter will be considered serious and the charity will undertake an investigation to determine the appropriate way forward. Depending upon the severity of the offence, one potential outcome could be the termination of contract if there has been a material breach of the terms of the contract. In some circumstances (for example, where the charity has suffered financial loss as the consequence of a contractor's conduct), the charity may take civil action against the contractor. For this reason, adhering to the code is an essential requirement.

## 22 Monitoring and assurance

Monitoring and assurance elements of this policy are outlined in individual sections, where appropriate.

## 23 Information and communication

This policy is communicated to colleagues as and when updated and following Board of Trustee approval. Further awareness is driven by the annual mandatory training cycle.

## 24 Related documentation

- Senior Managers & Certification Regime (SMCR) Policy
- Disciplinary policy and procedure
- Confidentiality policy and procedure
- Data Protection policy
- Acceptable Use (previously the Email, internet and social media) policy
- Dealing with external organisations policy

## 25 Document control

Version number	Summary of amendment(s)	Amended by	Approved by	Date (dd/mm/year)
19.0	Notification to Cifas of any finding of Fraud added – Introduction of Cifas	Kevin Kelly		April 2016
19.1	Notification of Procedure for gifts over £250 and CEO procedure for receiving gifts of £250	Richard McKenzie		November 2016
20.0	Introduction amended. Reporting lines amended, the figure of £250 reduced to £150 i.e. gifts over that amount need pre-approval.	Richard McKenzie	Board of Trustees	08/12/2016
20.1	Addition of guidance relating to online activity at section 14.4.	Jo Prosser		13/04/2017
20.2	Dealing with External Organisations Policy referenced in section 15 following Exec Board review & approval of changes 27/4/17	Susan Maloney		08/05/2017
21.0	21.0 Final, board approved document (approved at BoT 6/6/2017)	Susan Maloney	Board of Trustees	07/06/2017
21.1	21.1 Amendments to Gift & Hospitality guidance to reflect that redeemable vouchers can be accepted at discretion of Director of Risk & Compliance.	Susan Maloney	Board of Trustees	29/09/2017
21.2	21.2 Addition of section 2.3 in respect of Trustees and clarifications in sections 9 (G&H policy) and 14.2 (consumption of alcohol during work hours).	Susan Maloney	Board of Trustees	11/01/2019
22.0	22.0 Addition of section 4 in respect of SM&CR	Sophie Thompson	Board of Trustees	04/10/2019

23.0	23.0 Amendments to section 7 in respect of use of charity email and internet facilities and section 15.3 in respect of appropriate levels of attendance. Amendments to section 15.1 (and Appendix A) to reflect dress code. Amendments of section 15.2. Amendments to section 10 (and Appendix B) to define appropriate level of gifts (£10 moved to £25), authority levels £150 moved to £250) and prizes	Dorcas Atkinson	Board of Trustees	14/01/2019
24.0	24.0 Addition to section 10.2 in respect of gifts and hospitality: <i>"The maximum value of hospitality that can be accepted without prior approval from the CEO is £150 subject to the rules above. If hospitality is offered to more than one charity colleague at the same time (for example, an entire team attending an evening meal offered by a supplier or charity partner) the maximum aggregated value that can be accepted is also £150 without prior approval from the CEO."</i>	Richard McKenzie	Amendment approved by Board of Trustees as part of Gifts & Hospitality Register annual review	09/12/2020
24.1	24.1 Amendments to sections 2, 4 and 17 outlining that colleagues should be familiar with individual conduct rules outlined in the SMCR Policy Addition of section 7, outlining that colleagues should be familiar with and abide by all policies and procedures and any documented processes applicable to their roles.	Dorcas Atkinson	Amendments to Code of Conduct and associated SMCR policy updates approved by the Board	28/9/2021
25.0	25.0 Updated document published on SharePoint	Susan Maloney	Board of Trustees	04/10/2021
25.1	Transferred into new policy template and changes to the guidance around redeemable vouchers at section 14  Amendments to role and policy titles and email addresses throughout Insertion of specific regulations referred to within policy at Section 2 Amendments reflecting contractor/employee status at section 16  Appendix A – standards for dress, personal hygiene and appearance removed to reflect new ways of working and cultural development of StepChange  Amendments to 19.1, 2 and 3 as recommended by AARC	Susan Maloney (Group Risk Analyst)  Dorcas Atkinson (Head of HR)  Dorcas Atkinson (Head of HR)		
26.0	Approved at Board of Trustees following biennial review 27/09/2022 and published on SharePoint		Board of Trustees	03/10/2022

## Appendix B - Gift & hospitality notification form

**A. Gift/Hospitality received by StepChange Debt Charity employee:**

Date notified Risk & Compliance	Date hospitality /gift received	Name of recipient	Hospitality /gift provided by	Details of hospitality /gift received	Approx. value of hospitality /gift received (if known)	Additional information/comment s/action

**B. Gift/Hospitality given by StepChange Debt Charity to an external third party:**

Date notified Risk & Compliance	Date hospitality /gift given	Name of recipient	Hospitality /gift provided by	Details of hospitality /gift given	Approx. value of hospitality /gift given	Additional information/comment s/action

Please complete the form as appropriate and return to the Risk & Compliance team by email at [risk.management@stepchange.org](mailto:risk.management@stepchange.org)

**PLEASE NOTE:**

1. Gifts with a token value (< £25) do not need to be logged, unless redeemable voucher.
2. Gifts with a value over £50 must be handed into a member of the Risk and Compliance team member (member of the Group Risk team).
3. Cash gifts must **NOT** be given or accepted.
4. If a gift or hospitality value is over £150, pre-approval should be sought from the Chief Executive Officer. The gift or hospitality should still be notified but may not need to be handed in to a member of the Risk and Compliance team member.
5. The **maximum** value of hospitality that can be accepted is **£250**.