

# Code of Conduct

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Policy manager	Head of Human Resources
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## 2. Purpose

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This code applies to all colleagues of Foundation for Credit Counselling (FCC) trading as StepChange Debt Charity. It applies to employees, temporary workers, consultants, and contractors working for the charity.

The code of conduct sets out the Charity's expectations of all persons working for us and when representing StepChange. All persons working for us are expected to adopt, uphold, and hold each other to account against this code.

The code is issued to all new starters as part of their induction programme, and the code is reviewed and reissued each year.

This code is underpinned by the Financial Conduct Authority's (FCA's) Code of Conduct and ensures that we strive to do the best for our clients and partners by acting with integrity, due care, skill, and diligence, by being open and cooperative with the regulators and keeping our customers best interests at heart; treating our customers fairly and ensuring we act to deliver good outcomes.

The code sets out the standards of conduct expected of persons working for the Charity; however, its content is not exhaustive, and it is expected that all persons working for us will adopt a common-sense approach in relation to their conduct at/or relating to work. Examples of behaviour and conduct may still be considered a breach of the code even if they have not specifically been included in this document.

All persons working for the Charity are expected to familiarise themselves with and adhere to our policies, processes, and procedures. Any breach of the Code of Conduct could lead to disciplinary action.

For all colleagues, this document forms part of the employment contract.

## 3. Scope

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This code applies to all colleagues of Foundation for Credit Counselling (FCC) trading as StepChange Debt Charity. It applies to employees, temporary workers, consultants, and contractors working for the charity and the following legal entities:

- Consumer Credit Counselling Service Voluntary Arrangements Limited trading as StepChange Voluntary Arrangements.

## 4. Policy statement(s)

### 4.1 FCA Code of Conduct

The FCA Code of Conduct sets out rules that form the basis of this code. All persons working for us are required to comply with the FCA Code of Conduct.

	Conduct Rule	Example of Poor Practice
1	You must act with integrity	<ul style="list-style-type: none"> <li>• Misleading clients, customers, other colleagues</li> <li>• Falsifying documentation</li> <li>• Inappropriate expenses claims</li> <li>• Failing to follow regulatory rules and requirements.</li> <li>• Failing to follow internal policies and procedures</li> </ul>
2	You must act with due care, skill, and diligence	<ul style="list-style-type: none"> <li>• Failing to meet the relevant training and competency obligations</li> <li>• Failing to complete mandatory training on time</li> </ul>
3	You must be open and cooperative with the FCA, the Prudential Regulation Authority (PRA) and other regulators	<ul style="list-style-type: none"> <li>• Omitting or concealing material information in responses to requests from regulators</li> <li>• Not submitting regulatory reports in accordance with the FCA rule</li> </ul>
4	You must pay due regard to the interests of customers and treat them fairly	<ul style="list-style-type: none"> <li>• Allowing conflicts of interest to arise which put a customer at a disadvantage</li> </ul>
5	You must observe proper standards of market conduct	<ul style="list-style-type: none"> <li>• Failing to comply with the Market Abuse Regulation or any other relevant market and exchanges codes and rules</li> </ul>
6	You must act to deliver good outcomes for retail customers	<ul style="list-style-type: none"> <li>• Providing complex and technical documents to customers which make it difficult for them to understand</li> </ul>

	Conduct Rule	Example of Poor Practice
		<ul style="list-style-type: none"> <li>• Failing to provide relevant and appropriate support to vulnerable customers</li> <li>• Making it difficult for customers to contact us and to discuss their account or make changes</li> </ul>

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.

## 4.2 General Standards of Conduct

- You are required to act in accordance with the FCA Code of Conduct and the additional rules as are applicable to SMF roles.
- You are expected to have high standards of appearance and hygiene at all times and to project a positive Company image.
- It is against the law and dangerous to use a hand-held mobile phone when driving and so you must not use a hand-held mobile phone at any time when driving. The charity will not be responsible for any civil or criminal liability resulting from an employee being caught using a mobile phone whilst driving a company car or on driving on company business.
- In line with current legislation, smoking or vaping is not permitted anywhere on the charity premises or in company vehicles. Smoking and vaping are only permitted outside the building in designated areas.
- If you are required to use your own vehicle for business use, you must ensure that the appropriate insurance for the vehicle is in place. You must also have a valid UK driving licence. You must also ensure that the vehicle is always roadworthy and appropriate checks on the vehicle e.g., tyre pressure, are made.
- You are solely responsible for your possessions whilst on charity premises or on company business and must always keep them safe. The charity will not accept liability for damage to, or loss of, property, clothing, vehicles, or their contents, whilst on charity premises.
- If you damage any property belonging to the charity, either through misuse or carelessness, the charity reserves the right to make a deduction from your pay in respect of the damages.
- On termination of your employment, you must return all charity property, such as keys, laptops, disks, mobile telephones, company vehicles, documents, or any other items belonging to the charity. This is not an exhaustive list.
- During employment and after leaving, you are required to keep all information obtained during your employment with the charity confidential. This includes information about the charity business, clients, or customers. The only exception

is if you are required to disclose information required by law or in the proper course of your duties.

- You are required to meet all the standards of performance required of your job role.
- You must give your full co-operation to your colleagues and with management, and ensure that all other colleagues, our customers, and clients are treated with dignity and respect.
- You must comply with all reasonable management instructions and ensure that you comply with the charity's operating policies and procedures.
- You are required to conduct yourself in an appropriate manner at all times whilst at work and when representing the charity at social events or at events organised by the charity.
- You must ensure that you act in a manner which safeguards the charity's public image and preserve positive relationships with our customers, clients, or members of the public.
- We require you to work free from the effects of alcohol or non-prescribed drugs.
- You are required to ensure that you behave in a way that does not constitute unlawful discrimination.
- We do not tolerate modern slavery or human trafficking in any form. You are expected to remain vigilant; report concerns promptly and uphold our commitment to ethical and lawful conduct across all areas of work. Concerns should be raised via the Designated Safeguarding Lead Alex Pitcher (Chief Risk Officer) or by contacting Safecall, our independent whistleblowing hotline, either by telephone on 0800 915 1571 or make an online report at [www.safecall.co.uk/report](http://www.safecall.co.uk/report) if anonymity is preferred.
- You must not post any comments on blogs or social media networks which could be regarded as derogatory about work colleagues, clients, partners, or the charity.
- You must not carry out any covert recording of any type of conversation or meetings on charity or clients' premises or in Company vehicles.
- Any queries received from the media must be referred immediately to StepChange Press Office. You must not attempt to deal with queries yourself.
- You are not permitted to undertake any activity or other employment which may be considered as competing with the charity without obtaining management permission.
- 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 unless it has been agreed.
- 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. You must refrain from any action or activity, whether inside or outside work, which creates or gives the impression of creating a conflict between your interests and ours. Full details are set out in the Conflict of Interests Policy.
- You have a duty to always act in a manner that will best promote the charity's interests.

## 4.3 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 gross misconduct (a material breach of contract for contractors) and may result in dismissal without notice, even on the first offence.

## 4.4 Bribery and Corruption

The charity takes a zero-tolerance approach to bribery and corruption. Bribery and corruption 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 4.6 below).

## 4.5 Financial Crime

This section should be read in conjunction with the charity's Financial Crime Policy.

The charity is committed to the prevention of financial crime such as money laundering, the funding of terrorist activity, bribery and corruption, fraud and market abuse and, through risk-based internal procedures, policies and systems and

controls, strives to ensure that high standards of crime prevention and awareness are maintained by all Directors, colleagues and third parties, whether under a contract of employment or a contract of service or otherwise.

Through the application of our financial crime policy and supporting procedures, the charity aims to prevent, deter, detect, and investigate all forms of financial crime.

Within the context of the Financial Crime Policy, financial crime is defined to include:

- Money Laundering
- Terrorist Financing
- Fraud (Internal & External)
- Bribery & Corruption
- Market abuse and insider dealing

The charity's Financial Crime Policy applies to all persons working for us or on our behalf in any capacity, including colleagues at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

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.

## 4.6 Gifts & 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 are behaving with honesty and integrity and leading by example with fairness and transparency as well as complying with the law. You may accept gifts that have only a small value, but 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.

You must ensure that you comply with the full Gifts and Hospitality Requirements which is set out in Appendix 1.

- Gifts or hospitality offered to you, for which there is a dedicated notification form <https://forms.office.com/e/e0rKpT8UVh> and supporting inbox – [GiftsandHospitality@stepchange.org](mailto:GiftsandHospitality@stepchange.org)
- Gifts or hospitality you wish to offer to others.

Failure to disclose gifts or hospitality will constitute a disciplinary offence which will be handled in accordance with our formal Disciplinary Procedure.



## 4.7 Check Yourself!

Several key questions can help identify situations that may be unethical, inappropriate, or illegal. Ask yourself:

- Does what I am doing align with our values, this Code of Conduct and company policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- How would it look if it made the headlines?
- Am I being loyal to my family, the charity and myself?
- Am I telling the truth and being honest?
- Is this the right thing to do?

# 5. Roles, responsibilities & governance

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## 5.1 Policy Approver

The Executive Board is responsible for the oversight, review, and approval of this policy on an annual basis as a minimum to ensure it remains 'fit for purpose.'

## 5.2 Policy Owner (Exec Team member)

The Chief People Officer is responsible for the oversight of the development, review, approval, and effective implementation of the policy within their remit and is responsible for ensuring the policy is delivered for review / approval on at least an annual basis.

## 5.3 Senior Leadership Team (SLT) / Policy Manager

The Head of Human Resources is responsible for identifying and managing risks in relation to implementation of this policy. Management have responsibility for ensuring this policy is implemented and embedded in their area and to promote risk and issues for discussion at relevant functional meetings.

## 5.4 Risk Team

The Risk Team will centrally administer the production and revision of any core policies.

# 6. Waivers & exceptions

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It is not expected that dispensations (exemptions) to this policy will be required other than in exceptional circumstances.

Requests for dispensation should be made to the Policy Owner in the first instance and will be reviewed and approved by the approver(s) of the policy.

Where issues relating to non-adherence to policy / breach of policy results in widespread or significant client or colleague detriment the matter must be escalated to the Risk & Compliance Team in the first instance, or via the risk event reporting portal.

# 7. Monitoring and assurance

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Monitoring activity across the three lines of defence e.g. quality monitoring, compliance monitoring and internal audit provide assurance that the core policies are being implemented across the charity and operating effectively.

# 8. Regulatory & legal requirements

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This policy has been developed in line with relevant employment law and recommended practice and the following regulation and legislation:

- Senior Managers & Certification Regime
- Political Parties, Elections & Referendums Act 2000
- Smokefree (Premises & enforcement) Regulations 2006
- Bribery Act 2010

## 9. Related documentation

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The policy has been designed to support an effective internal control environment. Other relevant documents that support this policy are as follows:

- Conflicts of Interest Policy
- Disciplinary Policy
- Financial Crime Policy
- Bribery & Corruption Policy
- Anti Bullying & Harassment Policy
- Gifts & Hospitality Requirements set out in appendix 1.

## 10. Definitions

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Term	Definition
Market Abuse Regulation	Regulation offences include insider dealing, unlawful disclosure of inside information, market manipulation
SMF roles	Senior Management Functions
Modern Slavery	Range of exploitation including but not limited to human trafficking, sexual exploitation, forced labour, debt bondage, domestic servitude, criminal activities

## 11. Document control

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Version number	Status	Summary of amendment(s)	Amended by	Approved by	Date (dd/mm/year)
28.1	Draft	Full rewrite into new template	Sue Murdoch CPO	Executive Board	21/8/2025

29.0	Final	Full rewrite to new template	Sue Murdoch CPO	Executive Board	21/8/2025
29.1	Draft	Added Modern Slavery update (section 4.2)	Jane Brodie	Sue Murdoch CPO	8/9/2025
30.0	Final	N/a	Jane Brodie	Sue Murdoch CPO	16/9/2025

## 12. Appendix

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### Appendix 1 – Gifts and Hospitality Requirements

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 Chief Risk Officer or their nominated deputy (a member of the Governance & Legal Team).

You are responsible for ensuring that you notify Governance & Legal, 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 Chief Risk Officer, or nominee, that you are compliant with the policy.

You need to:

- notify Governance & Legal if the gift value is over £25.

- notify Governance & Legal if the hospitality received value is over £25.
- notify Governance & Legal of gifts or hospitality given to any external organisation.
- notify Governance & Legal of all instances where gifts or hospitality have been offered and declined.

If gifts or hospitality have been offered to or received by StepChange, please complete the notification form available at <https://forms.office.com/e/e0rKpT8UVh>.

If StepChange is offering gifts or hospitality to external third parties, or if you have any queries relating to gifts and hospitality, please contact: [GiftsandHospitality@stepchange.org](mailto:GiftsandHospitality@stepchange.org).

In the absence of the Chief Risk Officer, the Legal Counsel & Company Secretary 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 designated 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 Chief Risk Officer or their nominee.
- Any gift received that has an estimated value of £50 or more must be given to the Chief Risk Officer 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 Chief Risk Officer 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 Chief Risk Officer or their nominee.
- Should the CEO be offered a gift or receive hospitality of over £250, pre-approval should be sought from the Chair of the Board of Trustees. The gift should still be notified but may not need to be handed into the Chief Risk Officer 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.

Value of gift/hospitality	Record	Hand in to a Governance & Legal Team member
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 Chair of the Board of Trustees
Monetary gifts	Yes	Yes (Must not be accepted. You must record the fact that it was offered and declined.)

## 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, contractor, or temporary agency worker, 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 Chief Risk Officer or their nominee should be consulted for a decision on whether it would be appropriate for the employee to retain the prize.

## 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 Chief Risk Officer or a member of the Governance & Legal 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





