



ANTI-BRIBERY & MONEY LAUNDERING POLICY

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

Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to ten years imprisonment. If the Foyer Federation 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.

To comply with UK Government Money Laundering Regulations, the Foyer Federation must ensure that appropriate 'customer due diligence' measures to check that all customers are who they say they are.

An organisation must also put in place internal controls and monitoring systems. The nature of these controls will depend on the size and complexity of the business, including the number of customers it has and the number and type of products and services it provides.

Customer due diligence means taking steps to identify customers and checking they are who they say they are. In practice, as the Foyer Federation customer base is primarily made up of organisations rather than individuals, this means confirming the organisation existence as a registered company (through companies House) or charity (through the Charity Commission) and ensuring that a record is kept of all details (including customer name and contact information).

It may also be necessary to identify the 'beneficial owner' in certain situations. This may be because someone else is acting on behalf of another person in a particular transaction, or it may be because you need to establish the ownership structure of a company, partnership or trust.

Additional resources:

- Bribery Act 2010, quick start guide: <http://www.justice.gov.uk/downloads/legislation/bribery-act-2010-quick-start-guide.pdf>
- UK Government money laundering regulations: <https://www.gov.uk/guidance/money-laundering-regulations-your-responsibilities>

Policy

The aim of this policy is to help the Foyer Federation act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise individuals of the Foyer Federation's "zero-tolerance" to bribery.

In addition, this policy aims to ensure that appropriate due diligences is undertaken to identify customers and that payment is not accepted from any organisation suspected of money laundering or terrorist activities.

This policy applies to all permanent and fixed-term staff employed by the Foyer Federation, and any contractors, consultants or other persons acting under or on behalf of the Foyer Federation.

The Foyer Federation Responsibility

The Foyer Federation will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties - accounts are currently tracked using Xero and records are kept for a minimum 7 years.
- 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.
- Apply customer due diligence measures
 - when establishing a business relationship
 - when carrying out an 'occasional transaction' worth £15,000 or more
 - when suspecting money laundering or terrorist financing
 - when there are doubts about a customer's identification information that has been previously obtained
 - when necessary for existing customers - for example if their circumstances change

The Foyer Federation 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.
- Conduct business with un-verified clients, nor will it accept payment from any organisation suspected of money laundering or terrorist activity.

Employee Responsibility

Employees at the Foyer Federation 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.
- Conduct business with or accept payment from any unverified customers.

Non- Compliance

All employees have a role to play in enforcing the policy and are required to deal with any observed or reported breaches. Should employees feel apprehensive about their own safety in regard to addressing any breach, they should seek senior management support.

Failure to comply with this policy may lead to a lack of clarity over job role, learning needs or expected standards of performance, resulting in reduced effectiveness or efficiency, underperformance and putting service delivery at risk.

Any member of staff refusing to observe the policy will be liable to disciplinary action in accordance with the Foyer Federation's Disciplinary Policy up to and including dismissal.

Implementation of the Policy

Overall responsibility for policy implementation and review rests with the Foyer Federation senior management. However, all employees are required to adhere to and support the implementation of the policy. The Foyer Federation will inform all existing employees about this policy and their role in the

implementation of the policy. They will also give all new employees notice of the policy on induction to the Foyer Federation.

Monitoring Policy

The policy will be monitored on an on-going basis, monitoring of the policy is essential to assess how effective the Foyer Federation has been.

Reviewing Policy

This policy will be reviewed every two years and, if necessary, revised in the light of legislative or codes of practice and organisational changes. Improvements will be made to the management by learning from experience and the use of established reviews.

Policy Amendments

Should any amendments, revisions, or updates be made to this policy, it is the responsibility of the Foyer Federation senior management to see that all relevant employees receive notice. Written notice and/or training will be considered.

Additional Information

If you require any additional information or clarification regarding this policy, please contact your line manager. In the unlikely event where you are unhappy with any decision made, you should use the Foyer Federation's formal Grievance Procedure.

To the extent that the requirements of this policy reflect statutory provisions, they will alter automatically when and if those requirements are changed.