Catharsis
Creative Arts Therapy

Catharsis Fraud Prevention, Anti-Bribery and Corruption Policy

Introduction

This Policy has been prepared in order to ensure that all Catharsis workers understand their personal duty and obligations in ensuring that neither they, nor the Company, may legitimately face charges or allegations of malpractice or corruption in their business dealings and/or expose the company or themselves to financial liabilities.

This Policy is linked with the Staff Code of Conduct Policy. Catharsis workers (employed staff, freelance therapists and trainee therapists on placement) should conduct themselves in an open, honest, and objective manner at all times.

Any failure to observe any aspect of this written Policy may lead to disciplinary action, which could also lead to dismissal from work with Catharsis.

Definitions

Definitions relevant to this Policy are set out below:

Topic	Explanation
Fraud	Wrongful or criminal deception intended to result in financial or personal gain.
Corruption	The deliberate use of one's position for direct or indirect personal gain. Corruption covers the offering, giving, soliciting, or acceptance, of an inducement or reward, which may influence the action of any person to act inappropriately.
Theft	The physical misappropriation of cash or other tangible assets. A person is guilty of 'theft' if he or she dishonestly appropriates property belonging to another with the intention of permanently depriving the other of it.
Money laundering	Is the process by which criminals attempt to 'recycle' the proceeds of their criminal activities in order to conceal its origin and ownership, leaving them money that cannot be traced back.
Bribery	Bribing another person – a person is guilty of an offence if they offer, promise or give a financial or other advantage to another person with the intention of personal gain.
Solicitations	Deliberate acts committed against customers, suppliers or other stakeholders with the intent of obtaining money, gifts, favourable terms, priority or any benefit.
Deterrence	Fraud deterrence attacks the root causes and enablers of fraud. This analysis could reveal potential fraud opportunities in the process but is performed on the premise that improving organisational procedures will reduce or eliminate the causal factors of fraud.

Prevention	Strategies put in place to prevent fraud from happening.
Detection	Fraud detection is a topic applicable to many industries. It protects customers, stakeholders and the organisation.

Bribery

Bribery is, in the context of Catharsis business, the offering or accepting of any gift, loan, payment, reward, or advantage, for personal gain as an encouragement to do something that is dishonest, illegal or a breach of trust.

Catharsis prohibits any form of bribery. All Catharsis staff are required to comply with the highest ethical standards, and anti-bribery laws are applicable (*UK Bribery Act 2010*, *Fraud Act 2006*, or *Proceeds of Crime Act 2002)*. Integrity and transparency are of utmost importance to Catharsis and a zero-tolerance attitude is taken towards corrupt activities of any kind.

Offences: It is a criminal offence to:

- Offer a bribe
- Accept a bribe
- Bribe a foreign official
- As a commercial organisation, fail to prevent a bribe.

It is prohibited, directly or indirectly, to offer, give, request or accept a bribe, i.e. gift, loan, payment, reward, or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for the company, or in order to gain any personal advantage for an individual or anyone connected with the individual, in a way that is unethical.

If a Catharsis worker is offered a bribe, or a bribe is solicited from them, they should not agree to it unless their immediate safety is in jeopardy. They should immediately contact a member of Catharsis management so that action can be taken if necessary. The worker may be asked to give a written account of events.

If a Catharsis worker suspects that an act of bribery, or attempted bribery has taken place, even if the worker is not directly involved, they are expected to report this to the relevant member of the Catharsis management team.

Catharsis will ensure that all of its transactions, including any sponsorship or donations given to charity are made transparently and legitimately.

Solicitations

A solicitation is defined as any deliberate act which is committed against any customer, supplier or other stakeholder in the business with the intent of obtaining money, gift(s), favourable terms, priority, or any benefit, in return for or in relation to any goods or services provided by the company in the course of its business, and such actions are substantially related to self-interest.

Any Catharsis worker who breaches this fundamental principle will be subject to disciplinary action.

Business Gifts

The Managing Director or Service Development Manager must sign off all gifts over the agreed limit of £30.

Giving of Gifts:

- Catharsis will on occasion promote its activities, products, and services, with branded stationary and similar items, which may be given freely and openly. Such items may include pens, key-rings, trolley coins etc and would normally have no greater value than £30 per item

- No Catharsis worker is entitled or expected to offer a business gift without the express permission of the Managing Director / Service Development Manager. Small gifts to clients are at the discretion of the therapist and are not an expectation. Therapists should inform the Catharsis Senior Management Team of gifts given or offered, in order that they are not compromised (see Staff Code of Conduct)

- If a Catharsis worker is in doubt as to whether any planned expenditure of this type needs to be declared and discussed, then they should declare it.

- No gifts will be given to individuals or services when tender applications are in process

Receiving Gifts – General

- The receipt of gifts or substantial favours by internal or external workers e.g. therapists, partners or suppliers can give rise to embarrassing situations, and may be seen as an improper inducement to give some concession in return to the donor

- Any offers of gifts or favours of unusual size, or questionable purpose, should be reported immediately to the Catharsis Management Team without delay. Cash or cash equivalents (gift cards) should not be accepted

- No business gift may be accepted unless it has a nominal value of no more than £30 and can be described as advertising material

- Where a gift is offered outside of the parameters described, and in circumstances where refusal might immediately offend, then the gift will be accepted on behalf of Catharsis, but then immediately declared to the Catharsis Management Team. A decision will then be taken as to the proper distribution of the gift. In exceptional cases, for example, when Catharsis Management decides that the gift was made as a token of the doner's gratitude for a service carried out to a very high standard, the recipient may be allowed to retain the gift.

Receiving Gifts – Christmas

- Catharsis accepts that at Christmas, the nature of business gifts may change to items that are more 'festive', such as wine, food hampers etc. It is the policy of the company that modest gifts of this nature may be accepted, on behalf of Catharsis, but must be declared formally. Where possible the Catharsis Management Team will distribute the gift in an equitable and fair manner.

Receiving Gifts – Hospitality

- Modest hospitality is an accepted and acceptable courtesy of a business relationship, however, the recipient should not allow a situation to arise or develop whereby it may be thought by others to have influenced them in making a business decision as a consequence of accepting such hospitality

- If in the opinion of the Catharsis Management Team, the value / importance of the gift is such that either the company or the individual worker might be unacceptably compromised it will be declined.

Receiving Gifts – Via Third Party

- Catharsis shall not promote or receive a benefit from a customer or third party if the object of the benefit is to induce Catharsis to encourage its clients / candidates / workers to use the service of the donor

Money Laundering

Money laundering is the concealment of the origins of illegally obtained money by moving it through legitimate business transactions.

Catharsis is a therapeutic service working mainly within the public sector and, therefore, it is unlikely to be used as a vehicle for money laundering, hence is not legislated by the UK's anti money laundering regulations.

If any Catharsis worker has any cause to believe that any funds we receive or pay may involve the proceeds of crime, they have a responsibility to report this to the Catharsis Management Team without delay.

If any Catharsis worker has any cause to believe the Catharsis Management Team are involved in money laundering, they should escalate by contacting HCPC or the police.

General Fraud

Session delivery fraud: All incidents of suspected / alleged session delivery fraud will be investigated in line with our incident process and may be subject to disciplinary action. This could include where additional sessions are invoiced for and not delivered.

Fraud also includes misuse of company bank cards or accounts.

Fraud also includes data manipulation for personal or financial gain (see Data Sharing Policy for further information).

Any Catharsis worker who acts fraudulently will be subject to disciplinary action. Escalation may include reporting to HCPC, ICO and/or the police.

Incident Reporting and Roles

Within Catharsis there is a culture that supports safety and openness.

Catharsis commitment to preventing fraud is delivered by everyone within the organisation through understanding the importance of timely incident reporting and the significance of effective incident management.

All incidents of fraud or potential incidents of fraud are reported to the Catharsis Management Team for further analysis; outcomes of investigations are logged and reported back where appropriate. Investigation of an incident may include some or all of the following processes:

- Interviews with the key individuals involved
- Interview with the person affected (where appropriate)
- Interview with any witnesses
- Inspection of the location of the incident (if applicable)

- Inspection of any equipment involved (if applicable).

The Catharsis Management Team is responsible for the performance of our workers; employees and freelance workers. Catharsis Management, along with our accountants, are responsible for financial oversight of the company and for the relationship with HMRC. Concerns around Fraud, Bribery or Corruption may need to be escalated to the police, HCPC, HMRC or other body. The Public Interest Disclosure Act 1998 legally protects workers who raise concerns about malpractice in an organisation (see Catharsis Whistleblowing Policy for more detail).

Training/Implementation

Catharsis will enable their workers to participate in any training available in the organisation. Individual responsibilities regarding fraud, bribery and corruption are shared at induction via discussion and policy. The delivery of induction is the responsibility of the Catharsis Management Team.

Policy Standards

Catharsis management acknowledges responsibility for ensuring that the risks associated with fraud and corruption are managed effectively across all parts of the organisation.

Catharsis management acknowledges the threats of fraud and corruption in respect of the harm they can cause to the organisation and, as a result, its service users.

Catharsis management acknowledges the importance of a culture that is resilient to the threats of fraud and corruption and aligns to the principles of good governance. Responsibility is thus taken for ensuring the management of fraud and corruption risks. Catharsis management is responsible for setting specific goals of ensuring and maintaining resilience to fraud and corruption. It also explores opportunities for financial savings through fraud detection and prevention.

Review

Implementation / Review date	**Reviewers**
August 2025	Hannah Robertson
Next Review date	Keren Adler
August 2026	

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