

# THE COMMUNICATION WORKERS UNION

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## Expenses Policies and Procedures 2026

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## Introduction

Dear Colleague

### **CWU EXPENSES POLICIES AND PROCEDURES**

The previous CWU expenses policies and procedures applying to all payments made from Union funds, were introduced from 1 January 2016 following approval by the NEC.

As the Union is now implementing the electronic online 'Concur' system to cover claims for expenses, it makes sense to review our expenses policies and procedures alongside its introduction. The review has included an update to certain procedures, the removal of some that are no longer relevant and the introduction of others that are required due to events elsewhere.

The policies and procedures are mandatory and apply to all CWU Representatives whether you are a Local/Unit or Workplace, Area, Regional or National Representative and CWU Employees who claim authorised business expenses.

Please note that any wording that is shown in italics is based on specific advice received from HMRC.

Claims made outside of this policy will not be paid. To avoid this situation If you require further clarification or information regarding the policies and procedures then please contact the Head of Finance at CWU HQ.

**Dave Ward**

**General Secretary**

**Nabih Fonkwe**

**Head of Finance**

## Section 1: Travel and Subsistence

These policies and procedures are mandatory for all CWU Employees and Representatives.

### 1.1 Travel.

### 1.2 Subsistence.

### 1.3 Use of Home Phone and Personal Mobile Phone.

### 1.4 Overseas.

### 1.5 Entertainment/Hospitality.

### 1.6 Childcare.

## 1.1 TRAVEL (Excluding Mileage Allowances)

What is covered:

*Reimbursement of the costs actually incurred by CWU employees and CWU Representatives when supported by receipts, on journeys undertaken for business purposes by rail, air, sea and road (excluding mileage allowances – read the next notes below), but excluding ordinary commuting (read the definition below).*

Notes:

1. Claimants should attempt to obtain receipts for all authorised business travel, however where no receipt is available, claimants must keep a record of the journey(s) being claimed including retaining the ticket.

In respect of travel where an Oyster Card (or similar) is used then claimants should register the card prior to use and obtain a printout containing the journey(s) for which reimbursement is being claimed.

Minor business travel expenditure for which receipts are not available may be reimbursed under the terms of the CWU policies and procedures, provided there is alternative supporting documentation to confirm that the expenses were necessarily incurred. Examples include parking, congestion charges, road, bridge tolls, ULEZ/Clean air/Congestion etc. charges.

2. The CWU policy & procedures do not apply if the employee or representative is accompanied by a spouse or relative and so on. Additionally, it does not cover mileage allowances paid to employees using their own vehicles for business travel as amounts

paid to employees for mileage that are equal to, or less than, the published HMRC qualifying rates, are exempt from tax.

### **HMRC describes Ordinary Commuting as:**

*'Ordinary Commuting' is travel between an employee's home, or any other place that is not a workplace, and their normal place of work, and is not covered by this policy document.*

### **Travel Arrangements**

#### **a) Train**

(i) All travel must be by the cheapest option available including the use of tickets purchased in advance. Normally all travel should be by standard class. The use of First-class travel is permitted in exceptional circumstances, for example where trains are congested, and it is not possible to get a seat in standard class. In that event, where trains are congested, of the circumstances must be provided and attached to the appropriate claim form. First Class travel may also be used where it is the cheapest option available (employees or representatives claiming First Class travel will be required to provide evidence that this is a cheaper option e.g. by submitting a screenshot to show the price differential or the internet pages displaying fares available.

(ii) Any night travel where overnight accommodation is not claimed may be by use of the Railway Sleeper trains. In such cases First Class travel may be permitted following permission from the budget holder.

(iii) Rail cards and rail season tickets are not reimbursable under any circumstances. This includes but is not limited to Senior Rail cards, 26–30 Rail cards, Network, and all season-tickets (weekly, monthly, annual). Where branch or HQ reimbursement processes apply for approved business travel, representatives must still face the full cost upfront.

#### **b) Car**

The arrangements governing the use of private cars by CWU Employees/ Representatives on Union business for authorised commitments are as follows:

##### **(i) Authorised Users**

The Head of Finance is charged by the authority of the National Executive Council to maintain a record of all those who are authorised to use their private motor cars on Union business. Employees/Members who seek authority to use their car on Union business must first allow the Finance Department to have sight of their car insurance policy and subsequently submit the Certificate of Insurance to the Finance Department for check and renewal of authority on each policy renewal date.

Branches will need to have suitable arrangements in place to control and manage the use of private cars to comply with the above including keeping records of the claimant's insurance certificate, dates of expiry and an annual log of the total miles claimed.

(ii) Insurance

If you use your car for Union Business (also called **Business Use**), it must have **comprehensive insurance**. This means your policy must cover things like damage to or loss of your car, medical costs if you are injured, injury or death of passengers or other people, and damage to other people's property.

Make sure your insurance policy clearly states that it covers the car when used for **Union Business/Business Use**, and that any passengers travelling for the Union are included. This is important because you may receive an extra allowance for carrying Union passengers.

Your insurance company must also agree to protect the Union in the same way they protect you under your policy. They will still handle any claims themselves. To ensure this, ask your insurer to add a clause to your policy confirming this additional cover for the Union.

A copy of the policy certificate must be provided to the finance department in order for representatives to claim mileage. It is the claimant's responsibility to submit this certificate following renewal of the policy.

**Notes:**

It is the policy holder's responsibility to purchase their own insurance that includes business cover and any costs for this will not be reimbursed by the CWU under any circumstances.

(iii) Motor Mileage Rates Authorised User

(iv) These payments represent the maximum permitted to be claimed for business mileage by a CWU Employee/Representative in the respective tax year (currently 1 April to 31 March). The maximum is inclusive of all claims made against the CWU including payments claimed for any branch, region or national use.

These amounts are in accordance with CWU policy(s) and HMRC guidelines as of 1<sup>st</sup> April 2026.

All mileage claims for cars and vans:

- 1) First 10,000 miles will be paid at; 55p per mile.
- 2) Over 10,000 miles will be paid at; 25p per mile.

All mileage claims for motorcycles will be paid at 24p per mile.

All mileage claims for pedal cycles will be paid at 6p per mile.

The Concur online system will capture changes to the mileage rates and produce notifications when totals are exceeded.

(v) Passengers

Where more than 1 person is attending the same commitment, they are encouraged to car share. Where any claimant carries a passenger, whose own travel is proper to be paid from the General Fund, an additional allowance of 5p per mile may be claimed for the passenger provided that the passenger makes no claim. The claimant must note the name of the passenger(s).

For each additional passenger an additional 1p per mile may be claimed provided that the passenger(s) makes no claim.

(vi) Post codes

All mileage claims must be based on the most direct route. The claim should include the actual mileage. Claimants are required to provide start and finish postcodes for each element of their journey. These must match the location described in the commitment section. For mileage to be reimbursed, full UK post codes must be provided on the claim. In the event of a dispute Google Maps will be the system used to determine the actual mileage.

**Notes:**

Changes in mileage rates shall be determined from time to time by the National Executive Council, after the required specific authority of HMRC has been obtained, in respect of tax implications, prior to the implementation.

c) Taxis

There will be genuine occasions where taxis need to be used due to there being no public transport available, a claimant having mobility issues, or having to travel across unfamiliar locations at certain times of the day. Taxis that are used for work commitments must be paid for at the time of travel and receipts must be provided for reimbursement. There may also be occasions where taxi travel is a cheaper option than using public transport. In all circumstances taxi claims must be accompanied by an explanation outlining the reason why the use of a taxi was necessary.

d) Air Travel

Where CWU Employees/National Representatives require air travel then this must be agreed in advance by the budget holder whom the cost will be charged against and the Head of Finance

Where air travel is agreed bookings must be made using the cheapest option available.

The use of First-class travel is permitted in exceptional circumstances. In that event, a full explanation of the circumstances must be provided to the budget holder prior to the booking and payment. First Class travel may also be used where it is the cheapest option available (employees or representatives claiming First Class travel will be required to provide evidence that this is a cheaper option)

e) Ad-hoc travel related expenses

Any ad-hoc expenses incurred in relation to flights, such as membership fees for flight clubs, airport lounge access, or similar discretionary costs, will not be reimbursed to the representative. Only standard, pre-approved travel expenses as outlined in the policy are eligible for reimbursement. In exceptional circumstances, where additional baggage over and above the standard limit with airlines is required, prior authorisation must be obtained from the budget holder.

Claims for reimbursement of air travel will not be entertained unless the foregoing conditions have been adhered to.

Branches will need to have suitable arrangements in place to control and manage the use of Air Travel.

## 1.2 Subsistence

What is covered:

- The reasonable and necessary cost of a meal (food and drink) is incurred by an employee whilst travelling on business where the expenses of that travel are included in the section headed 'Travel (excluding mileage allowances).
- The travel must occupy the whole or a substantial part of a working day, encompassing the normal meal breaks.
- Claims must be submitted online to the Finance Department supported by relevant receipts in a digital format. Where an itemized receipt is not provided the claimant must detail what was purchased. This should be included in the notes box on the claim form or written on the card receipt.

The approved subsistence payments are as follows, up to:

- Less than 4 hours Nil
- 4-8 hours £9.50
- 8-12 hours £12.50

- 12-16 hours £17.50

Start and finish times for commitments are determined by the time the representative begins their journey to the engagement and the time they return home, rather than the scheduled meeting times. This approach ensures an accurate reflection of the full duration of the commitment, including travel. Receipts submitted for outside of the commitment time will not normally be reimbursed.

These rates are subject to annual review based on NEC approval and HMRC guidance.

- The reasonable cost (when supported by the relevant receipts or invoices) of accommodation, breakfast, lunch (if applicable), and an evening meal incurred by an employee who is required to stay overnight during a journey where the expenses of that travel are included in the section headed 'Travel (excluding mileage allowances).
- All commitments based outside of the UK are covered by the Overseas Subsistence Allowance. Please seek further guidance on this from the GS office.

#### **Notes:**

These policies and procedures do not apply if the employee is accompanied by a spouse or relative and so on.

The cost of videos, newspapers, private phone calls, and drinks that do not complement an evening meal are covered by the legislation relating to Incidental Overnight Expenses. Incidentals for a maximum of £5 can only be claimed where an overnight stay is incurred. Incidentals can only be claimed when carrying out commitments in the UK.

#### **Overnight Subsistence (Based on Bespoke Scale Rates) – UK Only**

What is covered:

A scale rate allowance up to a maximum of £145 or £165 in London to cover the costs of receipted actual expenses incurred by an employee who is engaged in 'qualifying travel'.

Qualifying travel is where the employee is:

- Working away carrying out your business.
- Required to stay overnight in the UK during a journey where the expenses of that travel are included in the section headed 'Travel (excluding mileage allowances)'.

*Accommodation includes hotels and other forms of board and lodging but excluding living accommodation, for example houses, flats, and so on.*

The CWU must make sure that scale rate payments are not paid to employees whose circumstances have changed and have ceased to qualify. This may be, for example, because the workplace is no longer temporary or because their duties have changed and they no longer travel in the performance of the duties or to a temporary workplace.

For clarity, CWU HQ employees are unable to claim travel, subsistence and accommodation when working at HQ. This is classed as Ordinary Commuting under HMRC guidance.

Where exceptional circumstances exist, these need to be approved by the budget holder.

The CWU must also keep sufficient records to show that regular checks have been undertaken to make sure that the travel expenses rules are being followed and that employees are entitled to the scale rate payments - this includes budget holders checking that the employees were engaged in qualifying travel and actually incurred qualifying expenses.

These policy and procedure do not apply if the employee is accompanied by a spouse or relative and so on.

**Notes:**

1. Where an evening meal is not included in the cost of accommodation i.e. bed, breakfast and evening meal then on production of the relevant receipts the CWU deem £45.00 as a reasonable amount for the purchase of an evening meal. This amount is inclusive of the actual cost of a ½ bottle of house wine (or equivalent such as 2 bottles of beer). Alcoholic drinks outside this limit will not be reimbursed. The alcoholic drinks must be included on the same receipt as the meal. Separate receipts will not be reimbursed.

There will be an exceptional circumstance where the above £45 limit is exceeded then an explanation as to why the claimant was unable to stay within the reasonable limit must be provided on the claim form, together with relevant receipts.

Where group meals have occurred, each claimant must list those in attendance and confirm the cost was shared equally. If a claimant has paid for multiple shares, they must list whose share they are covering. Group meal shares are not to be rounded either up or down, and the combined cost of all the claimant's shares must equal the total amount being claimed. The itemised receipt as well as the credit card receipt (where applicable) must both be supplied.

In cases where group meal participants belong to different departments or fall under different budgets their allocated budget code must be provided on the claim form to ensure costs are allocated correctly. All participants in a group meal should ensure their claims are submitted within the same timeframe. This allows the budget holder and the Finance Department to cross-check and verify the claims accurately.

2. HMRC has provided the CWU with the following supporting information regarding actually incurred expenses and receipts. This procedure must be always followed, failure to do so will result in claims remaining unpaid until such time as the explanation as detailed and required by HMRC is provided.

*The majority of point-of-sale receipts now itemise what was purchased irrespective of whether or not cash, debit or credit cards are used to make the purchase. That said I do recognise that this is not yet universal, and it is possible that the receipt will only show an amount, date, retailer name. Where it is not possible for the person to obtain an itemised receipt in order to verify the nature of their expenditure then I would accept a copy of the credit card receipt which verifies that a purchase has been made. However, in addition I would expect them to provide a contemporaneous record of the travel & subsistence expenses for which they are making the claim i.e. date, location, description and cost. For example: 09/12/2014 Fish & Chip Shop, street, location, items purchased Fish & Chips, Cup of Tea, £6.50 + £1.50, total £8.*

Exceptionally, where proof of purchase cannot be obtained the claimants must still itemize the purchase on the claim including a breakdown of costs. Note that this cannot be a regular occurrence. Where claimants frequently fail to submit receipts, this will be brought to the attention of the budget holder.

### **Reimbursement of Fuel Cost for Business Mileage in Company Cars (Mileage Allowances)**

What is covered:

*Payments to employees for fuel for business travel in company cars where the employee is responsible for purchasing fuel. You must keep records that show that payment is only made for business mileage.*

#### **Notes:**

This policy does not apply if you make any payments for fuel in the circumstances shown below. If you do, the standard fuel benefit charge will be due and should be shown on the employee's P11D:

- For journeys that are not business travel.
- Where there are no records to show that this was for business travel.

If the amount paid by you is more than the advisory fuel rates for company cars, the excess payment will be a taxable profit and should be shown on the employees' P11D and included in gross pay for National Insurance purposes.

#### **Hire cars**

Hire cars must not be used unless the budget holder has in advance authorised their use in exceptional circumstances. In such cases and prior to the request being considered, the claimant must provide a written explanation outlining the exceptional request and demonstrating the financial benefits.

#### **Subscriptions and membership**

Subscriptions/memberships to organisations such as Amazon Prime, Costco and any other types of trade memberships are reclaimable for CWU business-related activity, but must not be used for an individual's purposes.

Branches should ensure this is followed, and no exemptions are made.

### **Subsistence (General)**

Subsistence may be claimed where a CWU Employee/Representative is actively engaged on authorised CWU business and is required to attend a workplace that is not their normal place of work. Subsistence will not be paid where an elected representative chooses to work in a CWU office away from their place of work. In these cases, this office will be regarded as their regular workplace.

All claims for subsistence in relation to CWU commitments must adhere to the following principles:

- CWU Employees/Representatives must submit claims for all expenses on the appropriate claim form which must be duly signed by the claimant.
- To claim overnight subsistence the CWU Employee/Representative must be actually and necessarily required to stay away from home overnight. Once overnight stays are claimed the money paid covers a full 24-hour period.

To clarify, the 24-hour period begins from the moment a representative departs their home/office and ends when they return therefore inclusive of the accommodation allowance.

- All commitments and claims arising there from must be explained in detail and must be authorised in advance by the CWU HQ assigned budget holder for claims made via the CWU HQ expenses account or by the relevant branch authorising officer where they are being claimed via a branch.
- Overnight stays are not permitted on Friday, Saturday or Sunday nights unless in exceptional circumstances when they must be authorised in advance by the budget holder.
- Where overnight stays are claimed, evidence of home residency may be required to prove the necessity for an overnight.

The rates for overnight subsistence are the maximum claimable. In any event that hotel accommodation is not available within this range of subsistence all accommodation receipts must be retained and submitted when seeking reimbursement and supported by an explanation of why cheaper accommodation was not available.

### **Conference Expenses**

Whilst attending CWU Biennial Conference as a CWU delegate the normal subsistence rates will apply to all representatives including CWUHQ staff.

Where attendance involves an overnight stay where the accommodation has been booked and paid for directly by the Branch or CWU Head Office on a Bed and Breakfast basis, then delegates are entitled to an additional expenditure of up to a maximum of £70.00.

Expenditure must be for actually incurred expenses and must be for items covered by the CWU Policies and Procedures of the Union. All claims must be supported by the relevant receipts showing the expenses incurred.

### 1.3 Home Phone, Personal Mobile Phone and Software/Internet Costs

What is covered:

Reimbursement of the cost of business calls made from a private home phone or from an employee's personal mobile phone where:

- The employee has identified such calls on itemized bills.
- You have procedures in place to check that the costs relate to business calls.

#### **Notes:**

Line rental and broadband services must not be installed at a personal address or registered under an individual's name. All such services must be set up in the branch's name and linked to an approved place of work. Costs for line rental or broadband installed at a personal address or under a personal name will not be reimbursed to individuals

HMRC regards the installation of a telephone by the Union at the home of an Employee or Representative and the payment of full rental charges involved as constituting "benefits in kind". Accordingly, the Union cannot be responsible for those rental charges.

Therefore, CWU Employees/Representatives are advised to keep a general note of the calls made on Union business. Reimbursement can be claimed for calls from your home or mobile telephone providing that claims are supported by an itemised bill showing the amount being claimed. Reimbursement will only be made if such calls fall outside an existing data plan therefore incurring additional costs.

CWU are in the process of reviewing the purchases of IT equipment and centralising this process. Where a contract is due to expire, branches should contact the IT department to discuss the renewal.

Costs related to internet dongles, software packages such as Adobe or Microsoft, and email domain services require prior authorisation from the designated budget holder. Where applicable, these expenses should be processed through an invoice supplied directly to the organisation as the method of payment, rather than reimbursing individuals.

Authorisation from the budget holder applies to HQ representatives only. Branches should have a similar practice in place where the branch committee agrees to such costs beforehand.

Where representatives require additional IT equipment such as laptops, printers, tablets, monitors, keyboards and mice (this list is not exhaustive) they must first seek advisement from the IT department who will, where possible source and provide these items.

## 1.4 Overseas

Working or occupational visits abroad will be allocated by the General Secretary to the Branch, Regional and National Representative/Employee with the appropriate responsibility or expertise.

### (a) Travel Arrangements

All foreign travel arrangements are authorised/dealt with by the General Secretary's office. The method of travel (air, rail and sea) and the route and duration is primarily a matter of the Representative concerned but reimbursement will be for the cheapest direct fare by the chosen method of travel.

There is no objection to a break in the journey overnight, or during the day if it does not exceed a few hours or arises from the train services. More extensive breaks will not be chargeable to the Union. The Trustees/ Head of Finance have discretion in the application of these principles. In cases where the journey is overlapping or of an arduous nature, the General Secretary and the Budget Holder have the authority to authorise First Class or Club Class travel.

### (b) Visas

The CWU will reimburse Representatives who need to acquire a visa to carry out an authorised overseas business commitment for the Union.

(c) CWU insurance cover is provided through our indemnity insurance. Should additional insurance be required, this must only cover the dates of the commitment and be brought to the attention of the budget holder

If part of the ticket or accommodation costs incur additional insurance for the trip, this cost should be separated, as this portion is not claimable.

(d) Foreign Currency

All matters concerning foreign currency are dealt with by the GS/Finance Departments.

(e) Subsistence –

For all commitments overseas the appropriate Foreign Office rates and regulations will apply in accordance with the following guidelines:

- Where the circumstances of a visit or delegation necessitate such the hotel bill shall be met centrally, the relevant daily subsistence rate being adjusted accordingly.
- Where the hosts of the delegation meet part or all the total cost of a delegation, the subsistence allowance shall be adjusted accordingly.
- Where a representative must travel within the UK before commencing for the main part of their journey, or at the end of a journey, the standard CWU policies and procedures apply.
- Upon notification by the General Secretary of the details of a foreign visit, the Head of Finance shall calculate the subsistence entitlements in accordance with these provisions. On the return of the delegation the payment made shall be reviewed considering its report and if necessary be amended.

## 1.5 Business Entertaining/Hospitality

### Business Entertaining

What is covered:

*The cost of entertaining customers, potential customers, suppliers or other business connections at genuine business occasions.*

All claims for entertainment expenses must be supported with records that show all the following:

- The amounts spent on occasions.
- The nature of entertainment.
- The people were entertained.
- Reasons for the entertainment.

### Notes:

The following can usually be regarded as reasonable and genuine business occasions:

- Product launches.

- Lunches and similar events for customers or potential customers at which business is discussed.
- Exhibitions and similar events at which products are on display for customers.

(a) Gifts

This must be given on the initiative of the General Secretary or Head of Finance. Employees/ Representatives will be authorised to take with them a gift or gifts for presentation on certain occasions. Amounts for this will be provided on a case-by-case basis.

(b) Hospitality General

Where pre-planned hospitality or business entertainment is required, this should be cleared by the Budget Holder and Head of Finance. There will be occasions when ad hoc hospitality occurs. This should be cleared by the budget holder where possible. In both of the above instances, firm evidence of payments made will need to be demonstrated. Any request must also be supported by written authorisation of the relevant CWU HQ budget holder or branch authorising officer.

Business entertaining is for CWU representatives hosting external groups. *Acceptable claims include light refreshments, working lunches/evening meals and reasonable costs for hosting guests at an event directly related to the CWU objectives.*

To be eligible for reimbursement, hospitality claims must include appropriate food or non alcoholic refreshments and must meet the Union's hospitality guidelines

(c) Hospitality Overseas

Claims regarding hospitality expenditure abroad shall be met only when supported by details of the justification and firm evidence of the payment made, preferably in the form of receipted bills.

(d) Christmas / leaving events

Such events need to be authorised beforehand by the Budget Holder and the Head of Finance with a finite amount per person being capped at £25.

## 1.6 Child Care

The CWU provides childcare facilities to all participants at CWU Conferences.

Participation in other Labour movement conferences – nationally and internationally are dealt with on a case-by-case basis.

Issues surrounding childcare should be raised in writing with the Head of Finance.

## Section 2: HQ Representatives

This section is applicable to those CWU Representatives who are required to attend CWU HQ to perform their representative role, such as NEC and Industrial Executives members.

### 2.1 Accommodation/Facilities/Equipment.

### 2.2 Use of home as office allowance.

### 2.3. Insurance Cover.

### 2.4 Commitment.

#### 2.1 CWU HQ – Accommodation, Facilities and Equipment

##### (a) Headquarters Access

A building access card will be issued to relevant representatives, which can be used between the hours of 6.30am and 8.00pm (Mon-Fri). At the time of getting Photo ID cards, the Facilities department will provide a lanyard which must be worn within the building. Attendance outside of these times should be notified in advance to either Facilities Department or Reception, so that the 24-hour security can be informed. **No access after 9.00 p.m.**

CWU Headquarters car park is for CWU employees in the first instance. Staff access is monitored and allocated by the Facilities department. NEC/Executive members may use the upper car park, if available, at the discretion of the Facilities department.

##### (b) Accommodation/Facilities

NEC/Executive Members will be allocated a desk, filing cabinet, telephone and internal mailbox at CWU Headquarters. They will also have access to a computer with e-mail facility.

##### (c) IT Equipment

During their period of service NEC/Executive members shall be entitled to the use of an individual laptop computer. Members will be required to sign for and be personally responsible for the safekeeping of the equipment since it is not possible for the Union to ensure laptops when they are out of the Headquarters building. All those in possession of such equipment are asked to take particular care to ensure its safekeeping.

(d) Additional (other) Equipment

Requests for other (general) secretarial equipment essential for the performance of their role as NEC/Executive members will need to be authorised by the Facilities Manager. Any requests for 'high value' Items (such as chairs, desks etc) will have to be approved by the budget holder.

(e) Additional (IT) Equipment

Requests for other IT equipment (including replacements) must be in the first instance through your line manager (budget holder) then to the IT department. Where the IT department cannot source the required items, then the representative can make the purchase externally as advised by the IT department.

## 2.2 Use of Home as Office Allowance

Further information regarding the use of a home as an office is available from the Head of Finance.

## 2.3 Insurance Cover

(a) Personal Accident/Travel

The Union holds a 'declaration' type of policy which covers all CWU Employees, NEC/Executive Members without any action being required by them prior to travel. This policy applies when on authorised Union business, either at home or overseas.

(b) Personal Property

Insurance cover is provided for a figure up to £300 in respect of personal effects lost whilst travelling within the UK. This is conditional on either an overnight stay or UK flight and is provided for CWU Employees, NEC/Executive Members whilst travelling on Union business. The Union cannot accept liability for losses more than this figure.

(c) Partner

When a partner or child is accompanying a CWU Employee, NEC/Executive Member, it shall be notified in writing to the Head of Finance. Any costs incurred will need to be covered and paid directly by the partner.

(d) General

As in all insurance policies there are several exclusions and limitations involved. A summary of cover is available from the Facilities dept, for any Employee, NEC or Executive Member to inspect and copies will be provided on request.

## 2.4 CWU HQ Expense Accounts

### (a) Expense Claims

All expense claims for CWU Employees, NEC and Executive members will be paid via BACS payment from the Finance Department direct to their chosen bank account.

It is the responsibility of all claimants to ensure that their expense claims are submitted regularly to the Finance Department. For clarity this should be on a weekly basis, but in exceptional circumstances where this is not possible an explanation must be provided.

**ALL CLAIMS MUST BE IN ACCORDANCE WITH THE CWU EXPENSE POLICIES AND PROCEDURES AND MUST BE FOR ACTUALLY INCURRED AUTHORISED EXPENDITURE AND SUPPORTED BY RECEIPTS.**

**ANY BREACHES OF THESE PROCEDURES COULD RESULT IN THE REMOVAL OR SUSPENSION OF THIS FACILITY.**

### (b) Payments Made Direct to Personal Bank Accounts

Where payments for authorised claims are to be made direct to a personal bank account it shall be the responsibility of the claimant to provide their bank details and to subsequently notify the finance dept of changes. All Claims will need to be submitted digitally to the finance department regularly and where possible payments will then be made via BACs on a regular basis.

### (c) Corporate Credit Cards

The card and all monies loaded onto the card always remain the property of the CWU. Use of the card is limited to expenditure/reimbursement of authorised claims only. The card holder is responsible for all purchases made on the card in their name.

The card holder must ensure that the card is operated in strict accordance with the terms and conditions of the CWU and the card provider and the card must not be used by any one other than the named card holder. All CWUHQ credit card holders are required to strictly adhere to these policies without exception. Each

purchase must be allocated to the relevant budget code prior to submission with the associated signed claim form included. A completed claim form including receipts should be submitted to the finance department 14 days after month end. Under no circumstances should the card be used for personal use. This card is for CWU business related use only and failure to adhere to this can result in the removal of this facility.

### (d) Completion/Submitting Claims

When completing any expense claims the individual should ensure that they provide a description of the commitment undertaken, including the actual start and finish times, on a day-by-day basis.

All commitments/claims must have received prior authorisation from the relevant budget holder and must contain the relevant departmental budget code to which the expense will be charged against. Failure to provide this information could result in a delay to the reimbursement of your claim.

Please note that all claims MUST be for authorised expenditure only and any expenses claimed must be in accordance with the policies and rules of the Union. Any claims proven to be fraudulent will be dealt with in accordance with the rules and policies of the Union including consideration of instigating the CWU discipline procedures.

**By submitting your claims to the finance department, you certify that all the contents (i.e. commitment detail, dates and times etc.) are factually true and all costs were actually incurred.**

(e) Receipts

Receipts for any items claimed must be attached to all expense claims submitted for payment. Receipts must be provided for all claims, if no receipts are available, you must provide a written explanation to the Head of Finance. All images/scans must be clear and readable. The receipts should also show the dates and time(s) of the purchase.

(f) When a person leaves the organisation or their elected position if they have had an advance for their expenses this must be repaid in full. Head Office (HQ) may issue advances because it has the required financial controls, monitoring systems, and oversight processes in place to track both the payment and the repayment of advances. These controls have been reviewed and authorised by the Union's auditors. Branches must not issue advances, as they do not have the same audited systems or safeguarding measures to ensure proper tracking, accountability, and compliance.

(e) Authorisation of Accounts

All claims will need to be authorised by the appropriate budget holder in advance prior to processing payment. Claimants should note that unless the above instructions are followed there may be a delay until the Head of Finance has considered and authorised the claim.

### **Section 3: Branch Financial Policies and Procedures**

Please note that the policies and procedures contained herein are subject to review and will therefore be liable to further change, amendment and update in the future.

They have been specifically developed to assist branches in the control and management of their finances and are based on the mandatory principle that all payments and financial transactions must be processed in strict accordance with the rules, policies and procedures of the Union.

If there are any issues that you come across which are not covered in these policies and procedures, then you should seek the advice of the Finance department at CWU HQ.

### Financial Administration

The Trustees of the Branch i.e. The Branch Chair, Branch Secretary and Branch Financial Secretary/Treasurer are responsible for ensuring that the branch has effective procedures in place for the control and management of all Branch Finances.

Additionally, it is a requirement for all Branches to keep proper records of all payments made to and from the branch's accounts. Each payment must be made as an online bank payment. It is the duty of the Branch to maintain the financial records via the link circulated from the Finance Department.

### Expense Claims

All claims must be paid in strict accordance with the CWU Expense Claims Policies. These policies are in Section 1 of this document.

The CWU Expense Claims Policies and Procedures apply to all CWU Representatives and Employees.

#### Standardisation of CWU Expense Claim Forms

The CWU has produced a mandatory set of electronic claim forms which must be used for the administration and payment of expense claims. These are available from the Finance department at CWU HQ.

### Banking Arrangements

All Branch Bank Accounts must be held at Unity Trust Bank and have been authorised by CWU HQ.

Bank Accounts must be in the name of the Branch, and all accounts must be updated and categorised monthly. For the latest guidance on this please refer to the Head of Finance and the finance team.

Branches shall ensure that the Bank Mandate is accurate and kept up to date.

Where CWU HQ has authorised the use of additional accounts such as Welfare or Retired Members Accounts then the signatories of these accounts must include the Trustees of the Branch.

Whilst all Bank Accounts connected to the Branch are the responsibility of the Branch Trustees, each additional account must have rules and procedures detailing the precise purpose of the account and who is authorised to make payments. All transactions of any additional accounts will also need to be recorded on the Branch Financial System. The Branch Committee hold responsibility for each account held by the Branch. Each

account must have a set of rules and procedures that follow Union guidelines and detail the purpose of the account, including the names of signatories and their access.

## Payments

All payments must be for actually incurred expenses and must be paid to a named individual by bank transfer. Cash payments are not allowed under any circumstances.

### **Cheque Payments**

Cheque payments are no longer compatible with CWU branch financial procedures and no longer permitted for use.

### **Online Payments**

Payments must be authorised by at least 2 of the 3 Branch Trustees prior to being made and must be supported by a completed claim form signed by the claimant, authorising officer and have the relevant receipts attached.

If claims are being made for more than one representative e.g. the purchase of multiple train tickets, etc. then the form must contain an explanation of the reason and should be supported by sufficient information that allows the branch and CWU HQ to identify the reason and the individuals for whom the tickets or purchases have been bought.

Payments must be for authorised Union expenditure such as travel and subsistence or for the reimbursement of authorised purchases such as stationery and equipment, etc.

Any other payments made to representatives not covered above or that may be liable to Tax and National Insurance payments must be paid via the CWU HQ payroll PAYE system. This includes but is not limited to branch payments for loss of wages or unpaid leave. Further information regarding this matter is available from CWU HQ.

In respect of Branch donations or affiliation payments these must be in accordance with CWU policies and must be supported by the relevant receipt of payment or invoice. A copy of the minutes of the authorising meeting, i.e. AGM, Branch Committee, etc. should also be attached.

The CWU is not Financial Conduct Authority (FCA) registered or regulated and accordingly branches are not permitted under any circumstances to provide members with personal loans of any description. This includes season ticket payments, bus passes and advance payments for any work carried out.

Branches must ensure that the payments are made from the correct account i.e. General or Political. When a payment is made from the bank incorrectly it must be rectified in the same financial year with an explanation as to why this occurred.

## Branch Honoraria

All Branch Representative Honoraria payments must be made via CWU HQ please see LTB 932/12 for further information. Branches must complete the honoraria forms in full and submit these to the Finance Department at CWUHQ. Submissions will not be accepted directly from the claimant and must be sent in by the appropriate Branch Officials.

### Branch Credit Card(s)

Where branches wish to apply for a Branch Credit Card, then authorisation must be obtained from CWU HQ prior to application.

If approved the cards must only be used for authorised Union business only and all associated transactions must be recorded on the branch financial system.

Branch credit cards must not be used for making cash withdrawals.

Branch credit cards must not be used outside of these policies. Failure to do so may well result in withdrawal of this facility.

### Branch Asset Register

Branches are required to keep an up-to-date Asset Register containing information on items purchased by the Branch such as branch premises, office equipment, computers, laptops, printers, mobile phones, etc. This list is not exhaustive so branches should contact the Finance Department at CWU HQ if they require further clarification on whether an item should be recorded on the register.

The information should include as a minimum; the date of item purchase, price, serial number or identification number, location of item, name of person(s) who is in receipt of the item plus details of the arrangements for disposal as appropriate. Where a purchase for more than £1,000 is made a copy of the invoice / receipt must be submitted to the Finance Department for capitalisation.

### Insurance

All Branch premises must be insured and this insurance for all branch premises and equipment must be in line with CWU policy. The CWU currently insures through a group/company scheme and further details of this are available from the Facilities department at CWU HQ.

### Consultancy Agreements

It is recognised that branches occasionally need to the services of consultants to assist the branch on specialist subjects. An example of this could be to provide specialist representation to a member, whereas the case then the branch must enter into a consultancy agreement on each occasion. Further advice on this matter is available from CWU HQ.

## Employment of Members of Staff

To ensure that CWU remains compliant with the relevant employment legislation then it is a requirement that where any branch intends to engage paid members of staff then this must be authorised by CWU HQ in advance. It is also a requirement that all staff are paid directly from CWU HQ via the payroll system for PAYE purposes and the total cost will then be deducted from the branch via bank transfer or the rebate.

## Branch Year End Accounts

The Branch Committee and Trustees are responsible for ensuring that the Branch End of Year documentation is completed accurately and returned to CWU HQ by the required date.

## Branch Auditors

In accordance with the Unions rules branches are required to elect 2 Branch Auditors whose primary responsibility is to examine and audit the accuracy of the branch finances. Therefore, branches should take steps to ensure that these important representative positions are filled.

## CWU Rules

Please find below a copy of the relevant CWU rule governing the administration of Branch Finances these should be read in conjunction with these Policies and Procedures.

### **Rule 6.8 Branch Finance**

1. The Branch financial year shall be from 1 January to 31 December. Each Branch shall prepare annual balances, including a bank statement certifying the balance in hand of every account held by the Branch, which shall be submitted to CWU HQ Finance Department by no later than 28 February each year, unless CWU HQ gives notice of an alternative date. All financial vouchers shall be retained for at least two years from the date of the year-end concerned. Statements of account, bank statements and balance sheets shall be retained for at least seven years.
2. Every year each Branch shall produce a financial plan for the following year, which shall:
  - a) be agreed by the Branch Committee, published to members and lodged as a record at CWU HQ Finance Department.
  - b) show expected income based on membership figures at the time the plan is agreed by the Branch.
  - c) include detailed planned expenditure, following the principle that such expenditure shall not exceed income.

- d) identify the purpose of any annual surplus and the intention to use it on behalf of the members.
  - e) be reported on, against performance to date, to each Branch Committee Meeting.
3. Separate and distinct accounts shall be kept for each Scheme or Fund for which the Branch is responsible e.g. General Account, Savings Account, Welfare Fund, Political Fund, etc.
  4. Each Branch should keep proper accounting records compatible with CWU HQ Finance Department systems.
  5. Each Branch shall maintain a register of property and equipment showing cost and date of purchase and retain all receipts for such until disposal of the property or equipment. All property purchased by membership subscriptions remain the property of CWU.
  6. At least two signatures shall be required for withdrawals from any account held in the Branch name.
  7. A current statement of branch accounts, including all relevant books and supporting vouchers, shall be presented for inspection and approval at each Branch Committee Meeting and shall then be signed by the Branch Chair and Secretary
  8. Branch Auditors
    - a) The Branch AGM shall elect two Branch Auditors who shall not be Branch Officers or Branch Committee members. Their names shall be circulated to members and notified to CWU HQ Finance Department upon their election.
    - b) The Auditors shall examine and audit all Branch Accounts to ensure accuracy and shall have the right to examine and question the branch finances, financial policy, income and expenditure on behalf of the lay membership. All vouchers, receipts, bank statements, documents, accounts books, remittance forms and ledgers shall be examined to verify accuracy or otherwise. Auditors shall also verify all cash at the bank and shall satisfy themselves that all Branch income and expenditure is accounted for.
    - c) The Branch Auditors shall produce a signed statement to Branch members and copy it to CWU HQ Finance Department declaring they have executed their responsibilities.
  9. CWU HQ Finance Department, on the advice of the CWU national chartered accountants, shall be responsible for and fund the annual auditing of as many Branch accounts as is deemed necessary.

10. Branches shall not use Chartered Accountants unless authorised in writing by the Head of Finance, such Accountants shall be appointed by CWU HQ Finance Department.
11. The Head of Finance or appointed representative shall have the right to examine, on demand, all records of accounts and bank statements and attend Branch meetings to take part in any debate or discussion on the Branch Accounts.
12. To ensure reimbursement branch claims due to be met by CWU HQ must be forwarded within 3 months of the activity. CWU HQ shall notify all Branches of the year-end cut-off date for such claims.
13. Each Branch may allocate up to 5% of rebate income for the remuneration of their officials. The individual amounts to be paid shall be determined by the AGM. The responsibility for reporting payments made to the appropriate Inspector of Taxes, rests with the Branch.
14. Each Branch may establish a Welfare Fund by the transfer of not more than 5% of rebate income in each year. The Fund shall be used for giving financial and/or other assistance to members in appropriate circumstances. A Welfare Fund shall be administered by Trustees elected at the AGM in accordance with Regulations approved by the NEC.
15. When the Branch is closed all funds and financial documents shall be forwarded to the Head of Finance. All assets shall become the property of CWU HQ administered by the Head of Finance and no party shall have any claim on them unless determined by the NEC.
16. Each Branch shall make provision in its constitution to ensure compliance with these Rules.

## **Section 4: Bribery and Corruption Policy**

The Bribery Act 2010 (BA10) was passed by Parliament in April 2010 and came into force from July 2011.

The Bribery Act 2010 (BA10) reforms the criminal law to provide a new modern and comprehensive scheme of bribery offences that will enable courts and prosecutors to respond more effectively to bribery at home or abroad. The Act outlines four criminal offences, and includes two new\* offences under criminal law:

- 4.1 - Offering or paying a bribe.
- 4.2 - Requesting or receiving a bribe.
- 4.3 - Bribing a foreign public official\*.
- 4.4 - Failure of commercial organisations to prevent bribery\*.

Bribery is defined as follows:

“Offering or accepting any inducement, gift or advantage for personal gain, corporate gain or a breach of trust which contravenes policies, including the Standards of Conduct.”

The Act applies to all companies and individuals operating in the UK and will be enforced by the Serious Fraud Squad (SFO), Section 7 is a new offence and means that organisations can be prosecuted if employees are involved in bribery and the organisation has not undertaken reasonable steps to prevent this from happening. Individuals risk up to 10 years in prison with unlimited fines; organisations risk unlimited fines and debarment from EU contracts.

To support organisations in developing a robust anti-bribery and corruption policy, the Ministry of Justice (MOJ) have developed six principles for companies to follow.

The CWU has developed a comprehensive policy in line with the Bribery Act 2010 (BA10) for guidance. Representatives are asked to keep a record of all gift and hospitality offered to them. In case of doubt or difficulty, the matter should be communicated in writing to Head of Finance and seek guidance.

The intention is that all hospitality events organised by external suppliers will be published to CWU Branches, together with those participating in such events.

These policies and procedures are subject to ongoing review.

**Nabih Fonkwe**

**Head of Finance.**