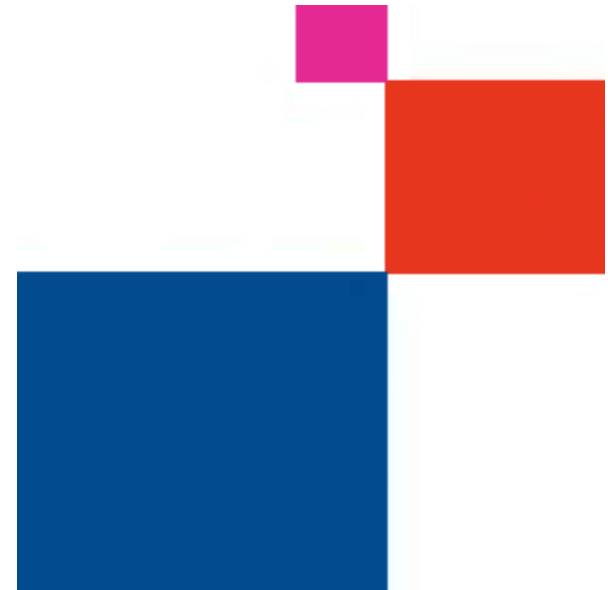




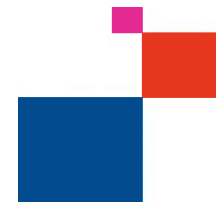
EMPLOYMENT ISSUES

Joanna Cowie, Solicitor
Head of Legal, HRi Legal



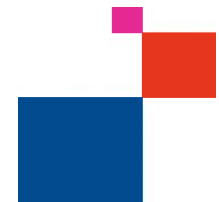
Key issues for employers

- **Who is an “Associated Person”?**
- **Adequate employment procedures**
- **Recruitment**
- **Gifts, hospitality and expenses**
- **Employment policies/procedure**



“Associated Person”

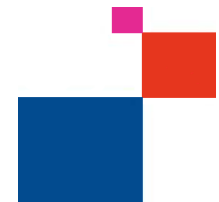
- **Section 8 BA 2010 - those who perform services for or on behalf of the employer:**
 - **Employees**
 - **Agents**
 - **Agency workers**
 - **Consultants**
 - **Volunteers**



“Adequate Procedures”

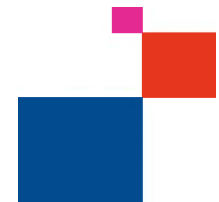
For Employers:

- Relevant to your business
- Evidence of top level commitment
- Risk assessment
- Communicate/train
- Monitor and update



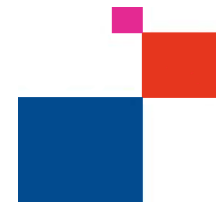
Recruitment

- **Additional checks where appropriate**
- **Document appointment decisions**
- **Induction procedure**



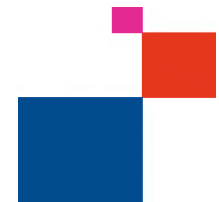
Gifts, hospitality and expenses

- **Gifts and hospitality**
- **Audit expenses processes regularly**
- **How and why the money was spent?**



Employment policies/procedures

- **Review whistleblowing policy**
- **Investigating allegations**
- **Disciplinary procedures**
- **Policy on giving and receiving of gifts**



Thank you

Joanna Cowie, Solicitor and Head of Legal, HRi Legal

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