



Internal financial controls for charities

Checklist – StreetGames UK 31st October 2020

Contents

1. Self-assessment checklist
2. Some key issues, monitoring arrangements and risk of fraud
3. Income
4. Purchases and payments
5. Assets and investments

1. Self-assessment checklist

The questions in this checklist are designed to help charity trustees and their advisers evaluate the charity's performance against the legal requirements and good practice recommendations set out in the commission's guidance on internal financial controls for charities. Trustees should review their charity's performance at least once a year.

Each of the questions on the checklist links to a paragraph of the guidance, where further details can be found. Not all the controls listed will be appropriate for all charities, for example, where a section of the checklist deals with an area of activity that the charity does not undertake then that section of the checklist will not apply.

Charities must always comply with legal requirements and these requirements are identified in the checklist. A 'yes' answer for good practice recommendations does not mean there is no scope for further improvement. A 'no' answer does not always indicate a problem. It may be that the charity has not put in place a particular control because the risk involved is small and the potential loss is acceptable, given the cost that would be involved in putting in place stronger internal controls.

Finally, the answers in the checklist should be based on the trustees' knowledge of what actually happens in the charity and not what they expect to happen. Having an internal control in place is only part of the picture. It must operate in practice to be effective.

2. Some key issues, monitoring arrangements and risk of fraud

2.1 Financial controls throughout the charity	Yes	No
Is the segregation of duties to provide 'double check'?	X	
Do the trustees carry out an annual review of the internal financial controls? Note – CC8 updated and reviewed by Audit Committee annually. Financial Regulations, Fraud, Procurement and Expenses policies are reviewed by Trustees in line with the overall policy review timetable.	X	
2.2 Monitoring activities	Yes	No
Are the budgets of income and expenditure prepared, and approved by the trustees?	X	
Is performance measured against budgets at regular intervals and explanations sought for variances? Note - monthly review of progress against annual budgets and explanations for variances discussed with budget managers. Management accounts are presented to the Finance Committee quarterly, which include an updated year end forecast and detailed commentary on performance and variations from budget.	X	
2.3 Internal audit and audit committee	Yes	No
Have the trustees considered the need to appoint an internal auditor or set up an audit committee? Note - Audit Committee has discussed using an internal auditor.	X	
2.4 Information and communication	Yes	No
Are the trustees provided with regular information about the financial performance of the charity?	X	
Do the trustees discuss the financial performance of the charity at each of their meetings?	X	
Are terms of reference in place for any finance sub-committee, or similar sub-groups of the trustee board?	X	
Does any finance sub-committee report to the full board of trustees for final decision making?	X	
2.5 Trustees' responsibilities	Yes	No
Are sufficient accounting records kept of all transactions? (legal requirement)	X	
Have the trustees considered the need for a reserves policy and put in place a reserves policy if one is needed? (legal requirement)	X	
Do the accounts comply with legal requirements? (legal requirement)	X	
Are the accounts formally approved by trustees at an annual meeting?	X	
Have the trustees appointed an auditor or independent examiner? (legal requirement)	X	
Are newly appointed trustees given a copy of the latest accounts?	X	
Do the trustees file the annual report and accounts and annual return on time? (legal requirement)	X	
2.6 and 2.7 Managing the risks of financial crime and abuse	Yes	No
Are trustees and staff made aware of why the charity is at risk from financial crime and abuse and of typical examples of potential fraudulent activities?	X	
Does the charity have an anti-bribery policy, policies on the acceptance of hospitality, the acceptance of donations and a register of interests in place?	X	
Does the charity have policies and controls over access to and storage of electronic information?	X	
Does the charity have computer programmes to protect its data and systems from external interference?	X	
Does the charity have procedures for reporting suspicions internally, and to the commission and the police? Note - whistleblowing policy in place.	X	

3. Income

3.1 Income received in the post	Yes	No
Note – based on current working practices of staff predominantly working from home.		
Is the incoming post opened in the presence of two unrelated people? Note – post sent to the office is picked up regularly and opened by the Business Services Manager.		X
Are all incoming cheques and cash recorded immediately? Note – number of cheques received is very low (usually only from a Charitable Trust or individual donation), but when received they are recorded on Access promptly. Cash is not received in the post.	X	
Does the charity keep unopened mail secure? Note - mail received via building concierge and will currently be placed in the locked StreetGames office.	X	

3.2 Income from public collections and fundraising events	Yes	No
SG does not carry out many public collections. Cash received at fundraising events is accounted for by staff completing a standard reconciliation sheet.		
If the charity undertakes public collections or fundraising events:		
• are public collections undertaken within legal requirements? (legal requirement)	X	
• are collection boxes numbered and their allocation and return recorded?	X	
• are all collection boxes sealed?	X	
• are all collection boxes regularly opened and counted by the charity and a record kept of their locations and history of takings?	X	
Note: SG does not have collection boxes sited at locations, they are generally used at specific events and the movements are controlled on the day.		
• are collections counted in the presence of the collector and a receipt given to them?	X	
• are two unrelated people involved in counting and recording the income?	X	
• is cash banked as soon as possible and without deduction of expenses? Note – cash is banked by the Finance team promptly when received. Should expenses be expected on the day then the staff organiser requests a cash float and accounts for the transactions.	X	
• are records maintained for each fundraising event? Project staff are required to complete a cash reconciliation form for monies received at an event.	X	
For ticket incomes are:		
• tickets pre-numbered?	N/A	
• records kept of all persons issued with tickets to sell, and which ticket numbers they have been allocated?	N/A	
• records kept of which tickets sold?	N/A	
• reconciliations made of money received against tickets sold?	N/A	
Has the charity complied with Part II of the Charities Act 1992 where professional fundraisers are engaged? (legal requirement)	N/A	
3.3 Gift Aid donations	Yes	No
Does the charity maximise the lawful take-up by its donors of Gift Aid?	X	
Are regular checks made to ensure all eligible tax repayments are obtained?	X	
Does the charity keep the records required by HMRC for Gift Aid claims?	X	
3.4 Legacies	Yes	No
Does the charity identify and monitor the receipt of large legacies and ensure that they are correctly included in the accounts? Note - SG has not received any legacies to date.	N/A	
3.5 Tainted charity donations and substantial donors	Yes	No
Has the charity kept the necessary records to identify transactions with 'substantial donors' for donations received up to April 2011? (legal requirement)	X	
From April 2011, have the trustees put in place procedures to identify 'tainted charity donations'? Note – Ethical Fundraising Policy is in place.	X	
3.6 Trading income	Yes	No
If the charity undertakes trading activities (either trading in furtherance of its objects or non-charitable trading):		
• if the level of non-charitable trading is significant is it carried out in a trading subsidiary?	X	
• does the charity have a pricing policy for the goods and services supplied?	X	
• does the charity have invoicing procedures for goods and services supplied?	X	
• does the charity review outstanding debts and collection procedures?	X	
• are there procedures to reconcile amounts invoiced and cash received to outstanding invoices?	X	
3.7 Banking and custody procedures	Yes	No
Are incoming receipts banked promptly?	X	
Is insurance held to cover the contents of the safe or cash box and cash in transit? Note – minimal amounts of cash held and thus not considered necessary.		X
Are funds banked without deduction of expenses?	X	
3.8 Checks on income records	Yes	No
Are regular checks made to ensure income records agree with the bank paying-in books and statements?	X	
Are checks made by someone other than the person who made the entry in the accounting records?	X	

4. Purchases and payments

4.1 Controls and authorisation of expenditure on goods and services	Yes	No
Is there a written policy on the authorisation of expenditure? Note – in Financial Regulations.	X	
Are invoices received checked against orders confirming pricing and the receipt of the goods or services ordered? Note – no formal purchase ordering system in place but invoices are authorised by budget managers who check against services ordered or contracts.	X	
4.2 Controls and authorisation of expenditure on grants	Yes	No
If the charity makes grants, does it have a grant-making policy? Note – grants team monitors applications, carries out organisation checks, issues SLAs and performance targets before payments are authorised.	X	
Does the charity make and monitor grants in accordance with the grant-making policy?	X	
4.3 Payment by cheque Note - Cheques only used in very exceptional circumstances.	Yes	No
Does the charity follow any stipulation in the governing document about who can sign cheques? Note - there is no stipulation in the governing document.	N/A	
Does the bank mandate require at least two signatories?	X	
Is there a practice of not signing of blank cheques?	X	
Are cheque books etc kept in a secure place with access only by nominated persons?	X	
Are any monetary limits placed on an individual's signing recorded in writing? Note: payments above £60,000 require written authorisation from the Chair of Trustees.	X	
Is all cheque expenditure recorded in the cash book and noted with the relevant cheque number, nature of payment and payee?	X	
Are cheques signed only with documentary evidence of the nature of the payment, eg invoice?	X	
4.4 Payments by debit/credit/charge card	Yes	No
Does the charity have a policy for the use of payment cards, including the criteria for their issue, spending limits and security? Note: Finance policy states that issue of cards is at discretion of Finance Director and applications are authorised by two bank signatories. There is an overall organisational credit limit and individual card limits are controlled by the Finance Team on the basis of operational need.	X	
Does the charity communicate the policy for the use of cards to all trustees and staff using them?	X	
Are cards cancelled when the holder ceases to work for the charity?	X	
Is all card expenditure supported by vouchers and invoices and recorded in the accounting records each time the card is used? Note – the new Access Expenses system is now used by cardholders to record credit card expenditure and upload copies of receipts as incurred.	X	
Are card statements sent to the charity finance team and checked to supporting records and invoices?	X	
Is the cardholder's use of the card independently reviewed periodically to confirm its use is consistent with the policy?	X	
4.5 Payments by direct debits, standing orders and BACS direct credit	Yes	No
Are only named individuals authorised to set up direct debits, standing orders and direct credits?	X	
Does the charity use a dual authorisation system for BACS payments?	X	
Does the charity monitor the arrangements to ensure that automatic payment arrangements are cancelled when the goods and services are no longer being supplied to the charity?	X	
4.6 Payment in cash	Yes	No
Is every effort made to minimise cash payments?	X	
Are all payments by cash made from a cash float and not from incoming cash? Note – 'on the day' costs at events are paid for from a separate float.	X	
Is supporting documentation authorised by someone other than the person maintaining the petty cash or the person making the claim?	X	
Are details of all payments entered in a petty cash book?	X	
Are regular independent checks made of the petty cash float and records?	X	

4.7 Wages and salaries	Yes	No
Are statutory deductions (tax and NIC) made from employees' wages and salaries and regularly forwarded to HMRC? (legal requirement)	X	
Does the charity comply with minimum wage legislation? (legal requirement)	X	
Are any other deductions from salaries made only where they are required or authorised? (legal requirement)	X	
Are the end-of-year returns (P60 and P11Ds) completed and filed with HMRC by the deadline? (legal requirement)	X	
If the charity employs staff are the required pension arrangements in place? (legal requirement)	X	
Do all employees have contracts of employment?	X	
Are personnel records kept and held separately from wages records?	X	
Are salary levels properly authorised and recorded?	X	
Is there a system of authorisation for recording and notifying starters and leavers, changes of hours and other payroll changes?	X	
Are payments made by BACS?	X	
4.8 The payment of expenses and reimbursements	Yes	No
Does the charity have a written policy to cover the payment and reimbursement of expenses?	X	
Is the policy communicated to all trustees, staff and volunteers?	X	
Are expenses reimbursed only where the individual incurred the expense in the course of carrying out the charity's business?	X	
Does the expense claim include a self-declaration that the claim is accurate and incurred on the business of the charity?	X	
Are reimbursements made by BACS transfer or cheque? BACS only	X	
If the charity pays mileage rates for travel are the rates in accordance with HMRC approved rates?	X	
4.9 Loans	Yes	No
Note – Bounce Back loan £50k received in July 2020		
Are the terms of the loan documented?	X	
Does the charity have a repayment plan in place to repay the principal and any interest due?	X	
4.10 Checks on expenditure records	Yes	No
Are regular checks made to ensure expenditure records are accurate and agree with the bank statements?	X	
Note – transactions updated daily and monthly bank reconciliations for all accounts.		
Are regular checks made to ensure no discrepancies between the payments made and the original invoice or payment records?	X	
Are checks made by someone other than the person who made the entry in the accounting records?	X	

5. Assets and investments

5.1 Controls over fixed assets	Yes	No
Is a comprehensive fixed asset list held and updated regularly?	X	
Are assets checked regularly to ensure they are still in good repair and are of use to the charity?	X	
Has insurance cover been considered?	X	
Note – insurance policy covers computers, office contents, equipment and merchandise.		
Is the use of fixed assets reviewed annually (to ensure put to best use and serving the charity's interests)?	X	
5.2 Investments	Yes	No
Note – SG does not currently hold any investments or endowment funds.		
Does the charity have an investment policy?		X
Note: Financial regulations specify that investments will be made via guidance from the Board and will take account of environmental and ethical concerns.		

Does this policy include the need to consider diversification of investments, including bank accounts? Note – diversifying bank accounts has been discussed at audit committee in the last year.	N/A	
Is the performance of investments regularly reviewed?	N/A	
Is professional advice taken, where appropriate, on the selection or disposal of investments?	N/A	
Does the charity inspect investment properties to ensure tenant covenants are adhered to?	N/A	
Are there controls to ensure that all investment income due is received?	N/A	
5.3 Money held as a current asset	Yes	No
Are secure records held of all bank and building society accounts?	X	
Are bank statements regularly received and regular bank reconciliations carried out?	X	
Are instructions to open or close accounts properly authorised and reported to trustees?	X	
Are checks made to ensure that there are no dormant accounts?	X	
Are the accounts monitored to ensure there is no third party use?	X	
Do the trustees regularly review the costs, benefits and risks of their current and deposit accounts? Note – Financial Regulations require the costs and benefits of banking arrangements to be reviewed every three years to ensure that charges and interest rates are competitive and that the banks’ credit ratings continue to be acceptable. The risks of holding funds above the maximum protected level per bank and the practical difficulties of using many banks have been discussed at Audit Committee within the last year.	X	
5.4 Electronic banking	Yes	No
If the charity uses electronic banking to make payments does the system used require authorisation of transactions by two individuals?	X	
Are PCs kept secure with up-to-date anti-virus and spyware software and a personal firewall?	X	
Are trustees and staff made aware of the need to ensure that the charity’s security details (including the password and PIN) are not compromised?	X	
Is the PIN and password regularly changed, for example to mitigate the risks of compromising security when individuals leave the charity? Note - passwords are specific for individuals rather than generic for all users. BACS and RBS require regular changes but Unity Bank does not.	X	
Does the charity maintain a list of persons (trustees and staff) who are approved to have access to the PIN and password? Note – PINs and passwords are on an individual basis.	N/A	
Does the charity keep an audit trail of electronic banking transactions?	X	
Have those using online banking facilities been trained in their use?	X	
5.5 Non-traditional banking Note – not used	Yes	No
If the charity uses non-traditional banking methods:	N/A	
• are policies set and approved by trustees defining the circumstances when non-traditional banking methods may be used?	N/A	
• is the use of such methods limited to essential transfers where traditional banking methods cannot be used?	N/A	
• does the charity keep an audit trail of non-traditional banking transactions?	N/A	
• does the charity ensure that the controls that are in place for its traditional bank transactions also operate with non-traditional banking transactions?	N/A	
5.6 Restricted funds and endowment funds	Yes	No
Are procedures in place to ensure that any restrictions put on the use of funds, by the donor or through an appeal, are observed?	X	
Does the charity ensure that the conditions attached to permanent endowments are observed? N/A – no personal endowments received.	N/A	