FINANCIAL AND ANTI-FRAUD POLICY AND PROCEDURES

Policy owner	Board of Directors
Version	1.0
Effective date	4 September 2026
Review date	4 September 2028, with financial controls reviewed annually
Applies to	Directors, employees, volunteers handling money or financial records, and anyone authorised to spend or manage CIC funds

1. Purpose

- Financial stability and sustainability
- Proper stewardship of funds
- Compliance with legal and regulatory requirements
- Transparency and accountability
- Protection against fraud and misuse of resources

2. Financial Responsibilities

The Directors have overall responsibility for financial oversight, approving budgets, monitoring performance, maintaining proper records and approving annual accounts. A Treasurer or Finance Lead may be appointed to support day-to-day financial administration.

3. Banking Arrangements

- Maintain a bank account in the organisation's name
- Keep organisational funds separate from personal funds
- Restrict banking access to authorised individuals
- Maintain at least two authorised bank signatories
- Where possible, payments over £500 should be authorised by two Directors
- No individual should authorise a payment to themselves

4. Budgeting and Monitoring

An annual budget will be prepared and approved by the Directors. Actual income and expenditure will be reviewed against budget at least quarterly.

5. Income

- Record income promptly
- Pay income into the CIC bank account as soon as possible
- Retain appropriate supporting documentation

6. Expenditure and Spending Authority

All expenditure must support the CIC's community purpose, be reasonable, represent value for money, be supported by invoices or receipts and be properly authorised.

Amount	Approval required
Up to £250	Authorised staff member or Director
£251-£500	One Director
Over £500	Two Directors

7. Expenses and Petty Cash

Reasonable expenses incurred on CIC business may be reimbursed. Claims should normally be submitted within three months, supported by receipts where possible and approved by someone other than the claimant. Directors must not approve their own expense claims.

If petty cash is used, a record must be maintained, receipts retained, balances checked regularly and the balance should not exceed £100 unless authorised by the Directors.

8. Financial Records and Reporting

- Bank statements
- Invoices
- Receipts
- Expense claims
- Grant documentation
- Payroll records where applicable

Financial records will normally be retained for at least six years. Directors will receive financial information at least quarterly, including current bank balances, income and expenditure, budget monitoring and significant financial risks.

9. Assets and Equipment

An asset register will be maintained for significant items owned by the CIC, recording description, purchase date, cost, location and disposal date where applicable.

10. Fraud Prevention and Financial Controls

The Joinery Hub Glasgow CIC operates a zero-tolerance approach to fraud, bribery, theft, financial misconduct and misuse of resources. Directors, employees, volunteers and contractors are expected to act honestly and safeguard the CIC's assets and funds.

Fraud includes

- Theft of money, equipment or assets
- Falsifying records or financial information
- Misappropriation of funds
- False expense claims
- Unauthorised use of organisational funds
- Payroll fraud
- Grant fraud or misuse of grant funding
- Deliberate concealment of financial transactions
- Bribery or corruption

Preventative controls

- Where practical, no single individual should control an entire financial transaction from start to finish
- No individual may approve their own payments or expense claims
- Payments to related parties require appropriate Director approval
- Payments and reimbursements should be supported by invoices, receipts, contracts or agreements
- Online banking access is restricted to authorised individuals
- Bank statements are reviewed regularly and unusual transactions investigated promptly

Procurement controls

Value	Requirement
Up to £500	One quote
£501-£2,000	Two quotes
Over £2,000	Three quotes where practical

Reporting and investigation

Anyone who suspects fraud, theft, corruption or financial misconduct should report the concern immediately to a Director. Reports may be made confidentially and will be treated seriously. No person will suffer detriment for raising a genuine concern in good faith.

1. Secure relevant evidence
2. Review relevant records
3. Conduct an investigation by the Directors or an independent person where appropriate
4. Take appropriate action, which may include recovery of funds, disciplinary action, reporting to funders, Police Scotland or regulatory bodies

11. Conflicts of Interest

Directors, staff and volunteers must declare personal, financial or family interests that could influence decision-making. Conflicts will be recorded and managed appropriately.

12. Reserves and Annual Accounts

Where possible, the CIC will seek to maintain unrestricted reserves sufficient to cover at least three months of core operating costs. Annual accounts will be prepared and submitted to Companies House and the CIC Regulator as required.

13. Review

Financial controls will be reviewed annually. The full policy will be reviewed every two years or sooner if significant changes occur.

Approval

This policy is approved on behalf of The Joinery Hub Glasgow CIC.

Name	Andrew Ferguson
Position	Founder and Director
Approval	Approved electronically for publication
Date	4 September 2026