



Newquay

Foodbank

Together with Trussell

FINANCIAL POLICY

POLICY CONTROL

Version	Description	Date	Approval
1.0	Financial Policy Incorporates fundraising, reserves and expenses policies	April 2026	Board
Next Review:		March 2027	
Owner: Director – Zoe Nixon			

This policy has been approved for issue

Signed: 

Position: Chair

Date: 22-4-26

LINKED POLICIES

IT & Systems Policy

Safeguarding Policy

APPENDICES

- A. Checklist for reviewing your charity's internal financial controls
- B. Legal Requirements
- C. Expenses Claim Form

TABLE OF CONTENTS

1. INTRODUCTION.....	4
2. SCOPE	4
3. FINANCIAL RECORDS AND ACCOUNTS.....	4
4. BANKING	5
5. INCOME.....	5
6. EXPENDITURE	5
7. PAYMENT DOCUMENTATION.....	6
8. BACS SIGNATURE.....	6
9. FUNDRAISING	6
10. DONATIONS & GIFTS.....	7
11. DONOR RECOGNITION.....	8
12. RECORDS OF DONORS	8
13. GRANT RECEIVING.....	8
14. GRANT RECEIVING PROCEDURE	9
15. FINANCIAL RESERVES	9
16. EXPENSES.....	10
17. FIXED ASSETS.....	10
18. REVIEW	10

FINANCIAL CONTROLS POLICY

1. INTRODUCTION

The Trustees recognise that internal financial controls are essential checks and procedures that allow the Trustees to:

- meet their legal duties to protect the charities' assets
- administer the charity's finances and assets in a way that identifies and manages risk, including risk of conflict of interest, loss, waste, bribery, theft or fraud
- ensure the quality of financial reporting by keeping adequate accounting records and suitable accounting policies are selected and applied consistently
- make judgements and estimates that are reasonable and prudent
- observe the methods and principles of Accounting and Reporting by Charities: Statement of Recommended Practice applicable to charities
- to ensure that Charity law is complied with
- prepare timely and relevant financial information

2. SCOPE

This policy covers all the charities' financial affairs including:

- financial records and accounts
- banking
- income
- expenditure
- delegation of financial responsibility
- asset register
- fundraising
- grant receiving
- expenses claim

3. FINANCIAL RECORDS AND ACCOUNTS

3.1 The accounting records must include:

- a cashbook, or electronic equivalent (e.g. Sage), analysing all the transactions
- HMRC compliant payroll records (NFB are registered for PAYE)

3.2 Accounts will be drawn up to the end of each financial year preferably within 3 months of the financial year end and submitted to the Charity Commission within 10 months of the financial year end.

3.3 The Trustees will approve a budget at the start of each financial year.

3.4 A report comparing actual income and expenditure with the budget will be presented at every full Trustee meeting or when requested by the Trustees.

- 3.5** Current requirements for the preparation of accounts and their independent accountants examination/audit can be obtained from the Charity Commission website.

4. BANKING

- 4.1** Bank accounts will be held by Newquay Foodbank. The following account(s) will be maintained:
- Lloyds Business Account
 - Lloyds Savings Account
 - Soldo Account
- 4.2** The bank mandate (list of people who can authorise payments on the charity's behalf) will always be approved and minuted by the Trustees as will any changes to it.
- 4.3** The Office Manager will reconcile bank statements with the charities' records on a regular basis, liaise with the accountant, and a report will be presented at Trustee meetings on the status of accounts.

5. INCOME

- 5.1** All income will be paid into the Newquay Foodbank Lloyds bank account, payments will be made
- i. either electronically via bank transfer
 - ii. any cash will be paid in using Banking Hub or Post Office
 - iii. any cheques will be paid in using Lloyds banking app (as of January 2026 Lloyds bank will no longer accept cheque payments over the counter)
- 5.2** All monies received will be banked without delay and recorded in the accounting records. The charity will keep records of all transactions in Sage.

6. EXPENDITURE

- 6.1** All expenditure incurred will be made in accordance with the objects of the charities. A budget will be prepared annually.
- 6.2** In respect of online banking, no payments will be paid without original documentation, passwords should not be written down or disclosed, and IT controls should be maintained to minimise cyber security risks.
- 6.3** Grant expenditure will be managed in accordance with the Grants Policy and NFB internal procedures, to ensure that all grant spending complies with the parameters, conditions and any restrictions, set out in the relevant grant agreements.
- 6.4** Any orders placed or undertakings given which are likely to cost the charity in excess of £25,000 must be authorised and minuted by the Trustees.

7. PAYMENT DOCUMENTATION

- 7.1** Every payment (including BACS, Direct Debit and Standing Order) out of Newquay Foodbank's bank accounts will be evidenced by an invoice. Invoices will be saved electronically.
- 7.2** Wages and Salaries. There will be a clear trail to show the authority and reason for every such payment. All employees will be paid within the PAYE, National Insurance and Pension regulations.
- 7.3** All staff appointments/departures will be authorised by the Trustees, minuting the dates and salary level. Similarly, all changes in hours and variable payments such as overtime, etc. will be authorised by the Director.
- 7.4** Petty cash will be maintained by the Office Manager who will have a float as agreed by the Trustees. When the float needs to be replenished, sufficient funds will be added to return the float to the agreed amount. All payments made from Petty Cash will be supported by receipts.
- 7.5** Expenses/allowances. Newquay Foodbank will reimburse reasonable expenditure paid for personally by staff and volunteers, providing:
- evidenced by tickets/receipt
 - mileage allowance as agreed by the Trustees
 - where possible, no signatory signs for the payment of expenses to themselves

8. BACS SIGNATURE

- 8.1** The Director, Operations Manager and Office Manager are authorised to authorise BACS payments under dual control.
- 8.2** Where possible, BACS should not be authorised by the person to whom it is payable.

9. FUNDRAISING

- 9.1** All fundraising will comply with the Code of Fundraising Practice issued by the Fundraising Regulator - [Code of Fundraising Practice | Fundraising Regulator](#)
- 9.2** Charitable Funds may consist of but are not limited to:
- Money which has been raised through fundraising events
 - Money which has been donated as a result of a fundraising appeal
 - Corporate sponsorship
 - Charitable foundation funds
 - Tangible personal property (gifts-in-kind)
 - Property
 - Shares or bonds

- Pledges (for example Fixed Crowdfunding)
- Money left in a legacy for the benefit of Newquay Foodbank

9.3 Newquay Foodbank will ensure that all fundraising activities carried out protect the organisation's reputation., all fundraising activities will be coordinated and monitored by the Fundraising Lead. All fundraising publicity will state clearly how the fundraising will benefit Newquay Foodbank, no staff member of Newquay Foodbank shall accept commissions or bonuses for fundraising activities on behalf of Newquay Foodbank.

9.4 If Foodbank fundraisers identify signs of vulnerability, they will respond appropriately and according to the principles of being legal, open, honest and respectful. When responding to a supporter or member of the public in vulnerable circumstances, staff will take all necessary steps to understand if the supporter is able to make an informed decision about donating to Newquay Foodbank and respond appropriately. If a supporter is deemed unable to make an informed decision the member of staff must not accept the donation. See also Newquay Foodbank's Safeguarding Policy

9.5 Newquay Foodbank will ensure that adequate permission for any static collection is obtained, and can evidence this where required; and that all collectors can be clearly identified

10. DONATIONS & GIFTS

10.1 Newquay Foodbank, in deciding whether to accept or decline a donation or gift will consider the charity's best overall interest and will not accept donations from donors whose activities appear to be in direct conflict with our charitable aims and objectives.

10.2 Additionally, Newquay Foodbank will not work with companies or individuals who participate in activities which:

- could cause detriment to the charity's reputation
- will disproportionately decrease the amount of donations to further the work of the charity
- undermine our vision and values
- are associated with unsuitable products, corporate or individual e.g. arms dealings, alcohol and tobacco
- are from individuals, groups or organisations which are known to take advantage of older or vulnerable people
- are from unknown sources of funding. Newquay Foodbank will take reasonable steps to determine the ultimate source of funding for each gift and satisfy itself that the funds do not derive, directly or indirectly, from activity that was or is illegal
- potentially harm our relationships with other donors, service users, stakeholders or volunteers
- expose us to undue adverse publicity or reputational risk
- require unacceptable expenditure or additional charity resources

10.3 If supporters wish to make a donation to a specific area of Newquay Foodbank's work, they must provide written instruction to this effect with their donation. If Newquay Foodbank is unable to accept the request for the specified donation and

the sponsor does not want the donation used in any other way, Newquay Foodbank will either refuse or refund the donation.

- 10.4** All anonymous donations of £25,000 or more will be reported to The Charity Commission as a serious incident (in line with current Charity Commission guidelines).
- 10.5** Donors will be encouraged where possible to confirm Gift Aid eligibility (if applicable) to maximise the impact of their donation.
- 10.6** Newquay Foodbank will adhere to the following good practice when handling cash donations resulting from face-to-face activities:
- Cash must be collected, counted and recorded by two unrelated individuals and counted in a secure environment, wherever possible.
 - Unsecured cash must never be left unattended or in an unattended environment
 - Cash must be banked as soon as is practicable
 - Cash not banked immediately must be placed in a safe or other secure location and the Office Manager must be notified

11. DONOR RECOGNITION

- 11.1** A donor to Newquay Foodbank is entitled to appreciation for his/her donation. Each donation over £100 will be acknowledged where possible.
- 11.2** Donor names may be published in the Newquay Foodbank materials, website and/or social media if permission is explicitly provided.

12. RECORDS OF DONORS

Newquay Foodbank will respect the privacy and contact preferences of all donors and will respond promptly to requests to amend contact details. These details will be held for the purposes of Gift Aid claims and acknowledging donations only.

13. GRANT RECEIVING

- 13.1** Newquay Foodbank will ensure that all grants received are managed transparently, responsibly and in line with legal, financial and ethical standards. Newquay Foodbank will:
- Seek grants that align with its Strategic Plan
 - Ensure that all funding sources are ethical and do not compromise its values or reputation
 - Comply with all grant terms, conditions, and reporting requirements
 - To ensure that the Charity law is complied with
- 13.2** Grant receiving responsibilities:
- Newquay Foodbank Trustees will oversee compliance

- The Director will approve acceptance of grants, ensure proper administration, monitoring and reporting
- The Fundraiser will be responsible for identifying and applying for relevant grants, acting as the primary point of contact with funders, and provide all required reports, updates and supporting information throughout the grant period, and to maintain records of all grants applied for including their outcomes.
- The Office Manager will maintain accurate financial records and ensure funds are used as intended

14. GRANT RECEIVING PROCEDURE

14.1 Identification & Application

- Research funding opportunities that match Newquay Foodbank priorities
- Prepare applications with accurate budgets, timescales, and measurable outcomes
- Obtain internal approval before submission

14.2 Acceptance of Grants

- Review grant agreements for obligations, restrictions and reporting requirements
- Obtain formal approval from the Board or Director

14.3 Financial Management

- Record grant income separately in the accounts
- Spend funds only on approved activities and within agreed timescales

14.4 Monitoring & Reporting

- Track Progress against agreed objectives
- Submit required reports to funders on time
- Inform funders promptly of any significant changes or issues

14.5 Closure & Review

- Complete final reports and financial statements
- Review project outcomes and lessons learned
- Archive all documentation for the required retention period

15. FINANCIAL RESERVES

15.1 Purpose of Reserves

The purpose of reserves for Newquay Foodbank is to ensure an ability to provide ongoing support during a period involving a drop in donations, a sudden increase in expenditure, event not covered by insurance or closure.

15.2 Amount of Reserves

It is considered that an unrestricted general funds reserve value equal to 4 months expenditure (based on an average monthly expense) plus provision for redundancy costs for employees, should be held.

The reserve should cover the cost of any pre-designated funds such as insurance and phone bills, average food expense and background running costs.

Where employee salaries have been specifically fundraised for and are held in "restricted" funds, the salary will not form part of the reserves. Where salaries are unrestricted, the value should be held in the reserves.

15.3 Reporting of Reserves

A report will be provided at each quarterly Trustee's meeting outlining the value of the 4-month expenditure and reserves fund.

16. EXPENSES

16.1

Newquay Foodbank believes that staff members should not be out of pocket for the contribution they make to the community.

The term "staff members" is used in Newquay Foodbank's policies to refer to any employees, volunteers, trustees or contractors that are 'working' for the Foodbank. "Foodbank visitors" is the term used to describe the beneficiaries of the Foodbank.

16.2

Where staff members of Newquay Foodbank incur reasonable out-of-pocket expenses during their Foodbank duties, they are eligible to claim reimbursement through the Expenses procedure.

Before any expenditure, all individuals should seek approval from an appropriate (eg Session) Lead or the Operations Manager.

All claims should include evidence of the expenditure eg receipts or details of the journey for mileage being claimed, and should be requested through completion of the Expenses Claim form which should be emailed to office@newquayfoodbank.co.uk.

17. FIXED ASSETS

Newquay Foodbank will maintain a Fixed Asset Register.

18. REVIEW

This policy will be reviewed annually, including financial controls checklist (Appx. A)

APPENDIX A

Checklist for reviewing your charity's internal financial controls

Use this checklist to check your charity's internal finance controls against the legal requirements and good practice recommendations in [Internal financial controls for charities \(CC8\)](#).

You should review your charity's internal financial controls at least once a year.

Answer the checklist based on your knowledge of what actually happens in your charity, not what you expect to happen.

Each of the points on the checklist links to a section of the guidance which you should read for full details.

Not all the controls set out below are appropriate for all charities. Only use the sections relevant to your charity's activities.

You must always comply with legal requirements identified in the checklist which are relevant to your charity.

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. For example, you may not have a particular control because it would not be appropriate for your charity's size or activities. Or it may be a reasonable risk for your charity, given the cost of putting in place stronger internal controls.

GENERAL PRINCIPLES FOR ALL CHARITIES		
1 Understand the types of controls appropriate for your charity	Yes	No
Your charity's financial controls cover all aspects of how your charity handles money		
You seek professional advice where you are not sure what controls are appropriate for your charity		
2 Understand your charity's financial information	Yes	No
All trustees are given regular information about the financial performance of your charity		
You discuss the financial performance of your charity at each trustee meeting		
You have terms of reference for any finance sub-committee, or similar sub-groups of the trustee board		
If you have a finance sub-committee it reports to the full board of trustees in line with terms of reference		

	Yes	No
3 Preparing accounts and reports		
You keep appropriate accounting records of all transactions (legal requirement)		
The charity's accounts comply with the relevant legal requirements (legal requirement)		
You prepare an annual report (legal requirement) and accounts which are formally approved by trustees at an annual meeting		
You have appointed an auditor or independent examiner (legal requirement for charities with gross annual income of over £25,000)		
New trustees are given a copy of the latest accounts, relevant guidance and the charity's governing document		
You file the annual report and accounts with the Charity Commission on time (legal requirement if your charity's gross annual income exceeds £25,000 or you are a Charitable Incorporated Organisation (CIO) and you are not an exempt or excepted charity)		
You file your charity's annual return on time (legal requirement if your charity is a Charitable Incorporated Organisation (CIO) or has a gross annual income of over £10,000)		
4 Embedding internal financial controls	Yes	No
Controls are understood and followed by everyone within your charity		
Training is provided on your charity's financial controls and policies		
5 Monitoring financial performance	Yes	No
Budgets setting out income and expenditure are prepared and approved by the trustees		
Performance is measured against budgets at regular intervals and explanations are provided for any differences		
6 Reviewing and monitoring your internal financial controls	Yes	No
You carry out an annual review of your charity's internal financial controls		
You have considered whether you need to appoint an internal auditor or set up an audit committee		
7 Splitting financial duties between people	Yes	No

Financial duties are split between people to provide 'double check' on all transactions		
8 Recording and reporting incidents	Yes	No
Your charity has procedures for recording financial incidents and reporting suspicions internally, to the Commission and to other relevant bodies which are well-known and working		
OPERATIONAL RISKS	Yes	No
Trustees and staff know why the charity is at risk from financial crime and abuse and know of typical examples of potentially fraudulent activities		
Your charity has appropriate policies in place which could include an anti-bribery policy, policies on the acceptance of hospitality, the acceptance of donations and a register of interests		
Your charity has policies and controls for access to and storage of data which complies with the General Data Protection Regulation (GDPR)		
Your charity's electronic equipment and online systems are appropriately protected		
INTERNAL FINANCIAL CONTROLS FOR BANKING		
Bank and building society accounts	Yes	No
You have a bank or building society account in the name of your charity		
You have a list of your charity's bank and building society accounts, which is regularly reviewed		
You carry out regular reconciliations between your accounting records and bank statements		
Instructions to open or close accounts are properly authorised and reported to trustees		
You check there are no unused accounts		
You monitor accounts to ensure there is no third-party use		
You regularly review the costs, benefits and risks of your charity's current and deposit accounts		
The bank mandate requires at least two signatories		

Online banking	Yes	No
Your online banking system requires authorisation of transactions by two individuals		
All electronic devices, such as laptops, phones and tablets, are kept secure with up-to-date anti-virus and spyware software and a personal firewall		
Trustees, staff and volunteers understand the need to ensure that the charity's security details (including the password and PIN) are not compromised		
PINs and passwords are regularly changed		
Your charity maintains a list of people who are approved to have access to the PIN and password		
Your charity keeps an audit trail of electronic banking transactions		
Cash held in your charity's bank or building society account	Yes	No
You carry out regular reconciliations		
You regularly check direct debits, standing orders and other transfers		
Banking cash and cheques	Yes	No
Cash and cheques are banked promptly and (before then) stored safely		
Your charity has insurance to cover the contents of the safe or cash box and cash in transit		
Funds are banked without deduction of expenses		
Alternative banking methods	Yes	No
You have policies in place that define when alternative banking methods may be used		
You limit alternative banking methods to essential transfers where regulated banking systems cannot be used		
Your charity keeps an audit trail of alternative banking transactions		
Your charity ensures that the same authorisation procedures for payments in the regulated banking system are used for alternative banking transactions		

INCOME		
Income from donations	Yes	No
Your charity regularly checks that all eligible tax repayments are obtained		
Your charity has procedures to identify 'tainted charity donations'		
Donations received from public collections and fundraising events	Yes	No
Public collections are undertaken in line with the rules set out in our guidance [link to CC20] (legal requirement)		
Your charity complies with Part II of the Charities Act 1992 where professional fundraisers are engaged (legal requirement) <i>(A charity employee does not count as a 'professional fundraiser' as long as they are fundraising in the course of their employment)</i>		
Collection boxes are numbered and their allocation and return recorded		
Collection boxes are sealed before use		
Collection boxes are regularly opened and counted by the charity and you keep a record of their locations and history of takings		
Collections are counted in the presence of the collector and a receipt given to them		
Two people are involved in counting and recording the income		
Cash is banked as soon as possible and without deduction of expenses		
Records are maintained for each fundraising event		
Income and donations received online and by card readers	Yes	No
Card readers are kept securely		
You reconcile the transaction history with income in your charity's bank account		
You comply with the Payment Card Industry standards		
Income and donations received by post	Yes	No
Post is held securely before it is opened		
Post is opened in the presence of 2 people		

Claiming Gift Aid on donations	Yes	No
Your charity maximises of its use of Gift Aid and its use of Gift Aid is lawful		
Your charity keeps the records required by HMRC for Gift Aid claims (legal requirement)		
INTERNAL FINANCIAL CONTROLS FOR EXPENDITURE		
Expenditure on goods and services	Yes	No
You have a policy on the authorising of expenditure		
Invoices received are checked against orders, and the receipt of the goods or services ordered is checked		
Payments by debit, credit or charge cards	Yes	No
You have a policy for the use of payment cards, including the criteria for their issue, spending limits and security		
Those who have a card has a copy of the payment card policy		
Cards are cancelled and destroyed where necessary, such as when cards are lost		
All card expenditure is supported by receipts and invoices and recorded in the accounting records		
Card statements are sent to a different person than the card holder and checked against supporting records and invoices		
You review your card use policy and check periodically that users follow it		
Mobile payment services, such as Google Pay and Apple Pay	Yes	No
You have the same controls as above for debit, credit or charge cards		
Payments by bank transfer, Bankers' Automated Clearing Services (BACS), Direct Debits and standing orders	Yes	No
Only named individuals are authorised to set up these types of payments		
You use a dual authorisation system for bank transfers and BACS payments		

You monitor the arrangements to ensure that automatic payment arrangements are cancelled where required		
Payments in cash or by pre-loaded cash card	Yes	No
You ensure that cash payments (and any use of pre-loaded cash card) are minimal		
All payments by cash are made from a cash float and not from incoming cash		
Supporting documentation is authorised by someone other than the person maintaining the petty cash or the person making the payments		
Details of all payments are entered in a petty cash book		
Regular independent checks are made of the petty cash float and records		
Paying wages and salaries	Yes	No
Any required statutory deductions (such as tax and National Insurance) are paid to HMRC and pension contributions to the provider (legal requirement)		
PAYE records are maintained as required by HMRC (legal requirement)		
You comply with minimum wage legislation (legal requirement)		
Any other deductions from salaries are only made where they are required or authorised (legal requirement)		
End-of-year returns (P60 and P11Ds) are completed and filed with HMRC by the deadline (legal requirement)		
You meet any required pension scheme arrangements (legal requirement)		
All employees have contracts of employment		
Personnel records are kept and held separately from wages records		
Salary levels are properly authorised and recorded		
You have a system for notifying and authorising changes such as starters and leavers, changes of hours and other payroll changes		
Payments are made by bank transfer or BACS		

Payment or reimbursement of expenses	Yes	No
You have an expenses policy that all trustees, staff and volunteers know and understand and your checks show the policy is implemented		
Expense claims include a self-declaration that the claim is accurate and incurred in connection with the business of the charity		
Expense claims are dual-authorized and do not involve the person making the claim		
Expenses are paid in a secure way		
Mileage rates for travel are in accordance with HMRC approved rates		
Internal financial controls for payments to related parties	Yes	No
Any payments to trustees or people/organisations connected to trustees are authorised. Where there are rules in your charity's governing document about payments to trustees, these are followed		
You follow the rules set out in our guidance on trustee expenses and payments and managing conflicts of interest in a charity		
Internal financial controls for assets and investments		
Tangible fixed assets	Yes	No
You regularly maintain a comprehensive fixed asset register		
Assets are regularly inspected to make sure they are in good repair and are of use to the charity		
You have considered your charity's insurance cover		
You review the use of fixed assets annually to make sure they are put to best use and serve your charity's interests		
Intangible fixed assets	Yes	No
You keep a record of all the intangible fixed assets your charity holds e.g. goodwill		
You hold electronic data securely and in line with GDPR requirements and any other relevant legislation		
Restricted funds and endowment funds	Yes	No

Your controls make sure restricted funds can only be spent on their specific purposes		
Internal financial controls for hospitality, including gifts	Yes	No
You have a clear policy that sets out when hospitality can be given and received		
You keep a record of hospitality given, received or refused		
All trustees, staff and volunteers understand and follow the hospitality policy		
Internal audit functions and audit committees	Yes	No
Internal auditors consult the internal audit international professional practices framework		
You have clear and agreed terms of reference for your internal audit committee		
You have an external audit if your charity must have one		
You have an internal audit committee if your charity is required to have an external audit		

APPENDIX B

LEGAL REQUIREMENTS

This policy takes into account the following legal requirements and regulatory codes, standards and guidance:

- Charities (Protection and Social Investment) Act 2016
- Charities Act 2006
- Charities Act 1992
- Data Protection Act 2018
- General Data Protection Regulation (GDPR).
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Payment Card Industry Data Security Standards (PCI-DSS).
- Fundraising Regulator Code of Fundraising Practice
- Institute of Fundraising Treating People Fairly Guidance
- Mental Capacity Act 2005
- Bribery Act 2010

APPENDIX C

EXPENSES CLAIM FORM



Receipts must be included for all items (except mileage)

For Mileage claims expenses are paid at 45p per mile. Please list the journey details i.e. from / to and purpose

Please return this form to office@newquayfoodbank.co.uk

Date	Description	Mileage (if applicable)	Amount (£)
Total Claimed			

Bank details for repayment (please enter)

Account name	Account number	Sort code
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I would like to donate _____% or £_____ of this claim back to the Food Bank
 My donation is eligible for Gift Aid Yes/No

Signed	Name	Date
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Management Approval

Signed	Name	Date
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