**Financial Control Policy**

**Wellspring West Sussex**

# 1100226

# This policy has been put together with regard to the Bribery Act 2010 and the Terrorism Act 2000 in order to ensure good financial governance of the charity and to minimise risk of fraud with regard to the funds of the charity.

# Internal Financial Controls For Charities

# See attached checklist from the Charity Commission website

**This checklist will be reviewed annually**

# The Bribery Act 2010 - principles of the Act

The Ministry of Justice sets out the six principles of the Act although these are not prescriptive but rather are intended to allow flexibility. They are outcome focused and can take into account the variety of circumstances and the size of organisations:

1. **Proportionality** - The action taken should be proportionate to the risk and the size of the organisation.
2. **Top level commitment** - Those in senior positions are best placed to ensure the organisation conducts business without bribery.
3. **Risk Assessment** - Many organisations will have little or no risk of bribery but a risk assessment will show the nature or extent of exposure to bribery.
4. **Due Diligence** - This is about having a risk based approach to business relationships - with those you deal with or who provide services for you.
5. **Communication** - Employers will need to communicate their policies and procedures to staff and others who perform services, additional training may help raise awareness, and this would be proportionate to the size and type of organisation.
6. **Monitoring and Review** - Risks to your organisation may change, over time you may want to carry out regular reviews and re-assessments.

**Terrorism Act 2000**

**The Terrorism Act 2000 outlaws groups considered to be terrorist in nature. A risk assessment should be carried out when engaging with new groups to ensure that the nature of their business/charitable status is in accordance with the aims of this charity.**

**Wellspring West Sussex January 2018**