

**Bethany School Finance & Financial Controls Policy**  
October 2025

Using Guidance Internal financial controls for charities

[Internal financial controls for charities - GOV.UK](#)

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**1. Why Bethany School needs internal financial controls**

Internal financial controls are important. They are essential checks and procedures to help:

- protect our school's assets, including its money and property
- make informed decisions about our school's financial position
- meet our legal duties, for example to manage Bethany School's resources responsibly

Fraud and financial mismanagement can happen at any school. Using suitable internal financial controls helps our school:

- identify and manage risks with its finances and assets
- keep good quality accounting records
- prepare timely and relevant financial information
- make sure our financial reporting complies with the relevant legal requirements

Mismanaging our school's finances or assets can damage:

- our school's financial viability, with consequences for how it delivers its education
- our staff and volunteers' morale
- our school's reputation
- public trust and confidence in charities

**1.1 Who is responsible for the internal financial controls**

The Governors are responsible for their school's financial management and for implementing and monitoring their school's internal financial controls.

Governors may choose to delegate the detailed work on financial controls to one or more Governors, Volunteer Treasurer or to members of staff. Bethany School has delegated the detailed work to a Volunteer Treasurer, the Chair and any Deputy Chair of the Governors, the Head Teacher and a Governor who takes special interest in Bethany School Finance

It is important Bethany School Governors/Staff/Volunteers understand and follow these financial controls.

## 2. General principles for Bethany School

### 2.1 Type of controls appropriate for Bethany School

Bethany School needs financial controls. They help to protect Bethany School's assets and get the most out of our resources.

Our financial controls should cover:

- all aspects of how Bethany School handles its resources and assets, including its money
- how we store personal data in line with the UK General Data Protection Regulation (GDPR) – This is dealt with in the Data Protection Policy

The types and levels of financial controls Bethany School needs will vary. For example, based on:

- Bethany School's size and structure
- where Bethany School operates
- what Bethany School does

Governors will decide which controls are appropriate for Bethany School and may take professional advice if necessary.

These controls must follow any requirements in Bethany School's governing document.

Governors can use the following guidance and any other appropriate guidance on making decisions

([Making decisions at a charity - GOV.UK](#)) and [managing risks in your charity](#)

(<https://www.gov.uk/government/publications/charities-and-risk-management-cc26>) to help identify which controls are suitable for Bethany School.

### 2.2 Understanding Bethany School's financial information

All Governors should have access to clear, accurate and up-to-date financial information, for example:

- the latest management accounts. These would usually be produced monthly. These usually report performance against budget and may include estimates for future periods
- the reasons for any differences between your financial forecasts and the school's current financial position
- details of cash flow and closing bank balances

Bethany School's financial position and performance should be:

- a standing agenda item at Governors meetings
- sent to each Governor before the meeting

Regularly reviewing the school's financial position can help Governors check that Bethany School is operating as a 'going concern' and isn't facing insolvency.

Further Information - Managing a charity's finances: planning, managing difficulties and insolvency ([Improving your charity's finances \(CC12\) - GOV.UK](#)) for more details.

All Governors are encouraged to question things they don't understand and highlight any concerns they have. The Governing body as a whole is responsible for Bethany School's finances. All Governors should understand the school's financial position and performance.

Bethany School may appoint a Treasurer who has day-to-day responsibility for looking after Bethany School's money and who reports to the Governing body. The Treasurer should work with the Chair of the Governors, Head Teacher and Governor with special responsibility for finance.

### 2.3 Preparing accounts and reports

Bethany School shall in accordance with its legal duty,

- keep accounting records,
- prepare annual accounts and
- produce a Governors annual report.
- Any other documents required by the Charity Commission or Companies House

When new Governors are appointed, they should be provided with copies of:

- the latest annual accounts
- the latest management accounts
- Bethany School's governing document
- the Commission's guidance on public benefit ([Public benefit: an overview - GOV.UK](#)) and
- the essential trustee: what you need to know, what you need to do (CC3) ([The essential trustee: what you need to know, what you need to do \(CC3\) - GOV.UK](#))

Also see Charity reporting and accounting: the essentials

(<https://www.gov.uk/government/publications/charity-reporting-and-accounting-the-essentials-november-2016-cc15d>). for the accounting and reporting duties of Governors

## **2.4 Embedding internal financial controls**

Everyone should follow Bethany School's internal financial controls.

All Governors, the Treasurer and the Head Teacher, should lead by example. They should follow all controls to help embed a culture of financial responsibility within Bethany School.

All Governors, staff and volunteers should be trained in Bethany School's financial controls. This should include training on:

- procedures to identify and report known or suspected financial crime or abuse
- how to raise concerns about the conduct of Governors, the Treasurer, Head Teacher/Deputy or other staff – See Complaints Policy

This Financial Controls Policy can only be changed by a decision of the Governors

## **2.5 Monitoring financial performance**

Bethany School's financial performance shall be monitored on a regular basis preferably each month by:

- comparing performance against financial policies, such as income reserve levels or investment performance
- monitoring Bethany School's financial performance against the budget.

A budget for each Academic Year should be produced before the beginning of the Academic year setting proper and realistic estimates of income and expenditure for each:

- area of Bethany School's activities
- financial year

All Governors should agree this before the start of the financial year.

All Governors and the Head Teacher should continue to get regular financial information. Which explains any significant over or underperformance of income and expenditure plans.

## **2.6 Reviewing and monitoring the Finance Policy and internal financial controls**

The Finance Policy and Internal Financial Controls should be reviewed once a year and

- after a significant financial loss or narrowly avoided significant financial issue
- before or after a significant change in how Bethany School operates, for example, a new structure or increased funding

This is to help make sure that:

- all controls including the basic ones such as bank and other reconciliations are carried out
- everyone involved (staff and Governors) are aware of and are following the Bethany School's policies and processes, for example if anyone suspects there is a problem
- Bethany School complies with its authorisation and approval procedures

Records/Minutes of Governors Meetings shall be kept of these reviews and the response to any issues found.

Bethany School should take immediate action if the review finds that anyone has misused the School's funds or may be doing so.

Consideration shall be made of any new risks, for example because of changes in operation, or new threats such as new types of fraud.

## **2.7 Splitting financial duties between people**

More than one person shall be involved in all financial transactions. A different person shall authorise a transaction to the person who made it. CAF Bank facilitates such dual authorisation.

## **2.8 Recording and reporting incidents**

Any incidents of financial crime, abuse or breakdown of Bethany School's financial controls shall be recorded and reported to the Governors.

Depending on the type and level of the incident a Report should also be made to:

- all types of fraud to Action Fraud ([Action Fraud](#))
- tax fraud to HMRC ([Report tax fraud or avoidance to HMRC - GOV.UK](#))
- any incident involving financial services, such as investments, insurance or pensions, to the Financial Conduct Authority ([Report a scam | FCA](#))
- data breaches to the Information Commissioner's Office (ICO) (<https://ico.org.uk/>)

Any serious incidents should be reported to the Charity Commission ([How to report a serious incident in your charity - GOV.UK](#)). For example, if there is a significant or potential loss to Bethany School's money or assets.

Governors should be aware that failure to report a serious incident to the Commission may result in regulatory action.

Bethany School's Independent Examiners have a separate duty to report any matters of material significance to the Charity Commission.

## **3. Operational risks**

### **3.1 Risks of fraud and cybercrime**

Fraud poses a serious risk to Bethany School's assets, including its data.

Bethany School stores information online. This includes personal details of donors, financial supporters, staff and suppliers.

The loss of personal or financial data could expose Bethany School and others to the risk of theft, fraud and loss.

Bethany School seeks to comply with the UK General Data Protection Regulation (GDPR) and any other relevant data protection laws including having a Data Protection Policy which covers:

- access, use, storage and processing of electronic data
- the use of computers and data storage, such as cloud storage and memory cards
- handling breach detection, investigation and reporting procedures

Bethany School shall engage Datamills (UK) Ltd or a similar Company to provide suitable software to protect against viruses and hacking.

Further information:

- [fraud \(https://www.gov.uk/government/publications/internal-financial-controls-for-charities-cc8/protect-your-charity-from-fraud\)](https://www.gov.uk/government/publications/internal-financial-controls-for-charities-cc8/protect-your-charity-from-fraud)
- cyber crime ([Protect your charity from cyber crime - GOV.UK](#))

### **3.2 Risks when operating overseas**

Bethany School does not currently operate overseas and should not without a Governors decision and advice and consideration of the risks involved including advice on the compliance with the Memorandum and Articles.

### **3.3 Risks of corruption and bribery**

Bethany School shall have policies and procedures to protect against bribery and corruption. These include:

- Seeking to maintain a register of interests for Governors, the Treasurer and Head Teacher to identify any conflict of interest ([Managing conflicts of interest in a charity - GOV.UK](#))
- Having "Declaration of Conflicts of Interest" as a standing item on the Agenda of Governors meetings
- Keeping a record of any hospitality accepted by Governors, the Treasurer and Head Teacher . See also Section 10 Internal financial controls for hospitality, including gifts

Bethany School will not make any 'facilitation payments'.

Further Information: [Bribery and corruption in charities](#)  
([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/654821/Chapter3.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/654821/Chapter3.pdf))

## **4. Internal financial controls for banking**

### **4.1 Bank and building society accounts**

Bethany School shall keep a bank or building society account.

Accounts shall be in the name of Christian Family Schools Limited as required by the Memorandum and Articles.

- The opening or closing of accounts shall be authorised by a vote and Minuted at the Governors Meeting
- The list of the bank accounts shall be kept in this Policy – See Appendix 1
- When accounts are no longer used these should be closed by a vote of the Governors in accordance with the Memorandum and Articles
- Every year the costs and benefits of Bethany School's bank accounts shall be reviewed, checking that any charges and interest rates are competitive
- Bank or building society accounts must all be regulated by the Prudential Regulation Authority.
- No one person should be able to control Bethany School's funds exclusively
- There is always approval for bank transfers and payments by 2 people
- Accounting records and bank statements are compared each month to make sure they reconcile
- A second person reviews reconciliations in the school to identify any discrepancies. This would normally include the Independent Examiner
- Bethany School's bank accounts shall not be used for any individuals', or third parties', private use.
- The bank mandate will set out who in the school is authorised to manage the school's bank accounts. These are listed in Appendix 1
- Regularly review whether the bank mandate is appropriate for Bethany School and any Governor or signatory changes notified to the bank
- Any changes to the account details or bank mandate should be agreed by a Vote of the Governors and dual authorisation required at the Bank for these changes.

### **4.2 Online banking**

Whenever provided by the bank a dual-authorisation system should be used for Bethany Schools' bank accounts.

Users should not share their security details with one another.

Whenever provided by the bank payments from Savings Accounts should only be into previously authorised accounts.

Bethany School shall

- Keep Statements and details of all online banking transactions including checks that the recipient is known and trustworthy
- Keep all devices with access to online banking facilities secure
- Keep all devices up to date with anti-virus, spyware and security system software in accordance with the Online Safety Policy
- Provide training in online security to all people who use its computer systems, who will take care to maintain security and keep up to date.

All Online banking Users shall keep all passwords and PINs secure

All Online Banking Users will change passwords periodically and also the school particularly following changes in authorised staff and Governors

### **4.3 Cash held in Bethany School's bank**

Bethany School shall if possible:

- Prepare monthly reconciliations for all accounts.
- A second person should review these reconciliations to identify any discrepancies, This would normally include the Independent Examiner
- Checks monthly that direct debits, standing orders and other transfers are correct
- Follows any requirements from the bank or building society
- All Bank Accounts shall be with Banks authorised by the Prudential Regulation Authority and protected by the Financial Services Compensation Scheme (<http://www.fscs.org.uk/>) up to £85,000.

### **4.4 Banking cash and cheques**

1. All cash and cheques received shall be recorded and banked promptly usually once a week
2. Cash and cheques not yet banked shall be stored in the locked Office and if possible, the locked filing cabinet
3. Cash will be banked gross, without deduction for costs or expenses
4. Cash and cheques stored at Bethany School shall be included in the Insurance Policy

### **4.5 Alternative banking methods**

No alternative banking methods shall be used

## **5. Internal financial controls for income**

### **5.1 Income from donations (Donations Policy)**

a) Governors, staff and volunteers will act in the best interests of Bethany School and do their utmost to solicit and accept funds to further its charitable objectives, with the presumption that donations are given in good faith and that refusal must be only on the strongest grounds. In soliciting donations from individuals or organisations Bethany School will act with honesty and integrity, will not put undue influence or pressure on donors and will not mislead or knowingly give false information. We will not solicit nor accept donations from anyone whom we know, or think may not be competent to make their own decisions and will be sensitive to any particular need that a donor may have.

b) Governors have overall responsibility for decisions relating to whether a donation is accepted or refused. Governors must be able to demonstrate that they have acted in the best interest of the school. Governors have a duty to consider carefully, on the basis of the evidence made available to them, whether the school's interests will be better served by accepting or refusing the donation and to act accordingly.

c) All large donations over £10,000 shall be enquired into, their origin ascertained, their legality and compliance with the Bethany School governing documents and the law are satisfied. All interested parties should be able to make representations and the result of these enquiries will be reported to the Governors and Minuted. If there are any suspicions raised these should be reported to the Chair and Treasurer. These will be reported in full to the Governors and if on further investigation there are continuing concerns refusal or return of the donation should be considered and the Charity Commission be informed and if appropriate the police.

d) Anonymous donations over £25,000 will be reported to the Charity Commission.

e) Where a donation over £1,000 is anonymous and the origin of the donation cannot be ascertained the Governors will decide whether to accept the donation.

f) No donations of Crypto assets will be accepted.

g) All donations shall be in accordance with the Charity Commissions Accepting Refusing and Returning donations to your charity guidance

<https://www.gov.uk/guidance/accepting-refusing-and-returning-donations-to-your-charity> and the Charity Commission "Due diligence, monitoring and verifying the end use of charitable funds"

[https://assets.publishing.service.gov.uk/media/65df4106b8da63b345c861e9/Chapter\\_2\\_Due\\_diligence\\_monitoring\\_and\\_end\\_use\\_of\\_funds.pdf](https://assets.publishing.service.gov.uk/media/65df4106b8da63b345c861e9/Chapter_2_Due_diligence_monitoring_and_end_use_of_funds.pdf)

<https://www.gov.uk/government/publications/charities-due-diligence-checks-and-monitoring-end-use-of-funds>

h) All fundraising and grant applications undertaken on behalf of the organisation will be done in the name of the school with the prior approval of the Governors

## **5.2 Tainted charity donations**

No donation will be accepted where the donor appears to donate to get a financial benefit from the school.

## **5.3 Donations from public collections and fundraising events**

Holding large sums of cash can leave Bethany School vulnerable to theft or fraud.

Staff, parents, Governors and supporters should report any potentially fraudulent fundraising activity.

When collecting cash:

- at least two people should handle and record the cash
- it should be banked as soon as possible without deducting expenses
- records are kept for each fundraising event to identify how much has been collected and the costs incurred

When tickets are sold, tickets should be:

- numbered
- records are kept of who has which ticket number, keep a record of sold tickets
- all money and any unsold tickets are collected so receipts can be reconciled against tickets sold

## **5.4 Income and donations received online and by Card readers**

1. Any Card readers should be kept securely and maintained by agreed individuals
2. Card readers are only linked to Bethany School's current account listed in Appendix 1 bank account
3. Passwords are kept secure
4. The Treasurer is notified when the Card reader is used
5. Monthly reconciliations are made to match the transaction history with the income

## **5.5 Income and donations received by post**

Income received in the post should be:

- held securely
- opened promptly preferably in the presence of 2 people
- accurately recorded and banked

## **5.6 Claiming Gift Aid on donations**

Where possible Gift Aid will be claimed on all eligible donations. These should be claimed at least once a year.

## **5.7 Donations of crypto assets**

No donations of cryptocurrency will be accepted

## **5.8 Income from trading**

Bethany School at present does not have a trading scheme. If they were to undertake a trading venture procedures and controls should be agreed first.

## **5.9 Income from legacies**

As there can be a long delay between being told of a legacy and receiving it.

- a) a record should be kept of all expected legacies
- b) all related correspondence should be kept and reviewed
- c) progress on collecting outstanding legacies regularly reviewed and reported to the Governors
- d) if any items or property are left to the Bethany School these are held securely, valued and, if appropriate, sold so that the income can be used.

## **6. Internal financial controls for expenditure**

### **6.1 Expenditure**

All expenditure shall be

- in accordance with the agreed Budget
- Only what the school needs
- Is good value for money

Any spending outside agreed budget should be authorised by a vote of the Governors

Invoices should be checked against orders to confirm the receipt of the goods or services ordered

### **6.2 Payments by Bank/Business cards**

All Bank/Business Cards issued by Bethany School

- Shall be used in accordance with the agreed budget
- The Cardholder will always ask for receipts, including for contactless payments
- The Cardholder shall provide all receipts for checking against account statements
- The Cardholder shall return the card to the school if their circumstances change, for example they leave the School
- All receipts and invoices are matched to statements
- Card use shall be regularly checked to make sure the school's policies are being followed
- The Cardholder will make sure they cancel and destroy the relevant payment card if it is lost or stolen
- And when the Cardholder is no longer involved with the school the authorisation of the card's use is withdrawn

### **6.3 Mobile payment systems, such as Google Pay and Apple Pay**

Mobile payment systems, such as Google Pay, Apple Pay and PayPal can be used by the Cardholder but should be kept secure at all times and comply with Section 6 of this Policy

### **6.4 Payments by bank transfer, Bankers' Automated Clearing Services (BACS), Direct Debits and Standing Orders**

1. Only those on the Bank Mandate voted for by the Governors and listed in Appendix 1 should set up payments
2. Each Online Banking transaction will be authorised by or signed by at least two people.
3. An Online Banking transaction must not be authorised by or signed by the person to whom it is payable
4. All online Banking Passwords should be kept safe and always used in a secure manner
5. Documents evidencing all new payments shall be kept and sent to the Treasurer including ongoing commitments
6. Payments are cancelled when they are no longer required
7. Batch payment files may be created but they must be kept secure at all times

### **6.5 Payments by cheque**

All payments by cheque should be

1. Signed by two people in accordance with the Bank Mandate and
2. Be in accordance with the agreed budget
3. Cheque books should be kept in a secure place
4. No blank cheques shall be issued
5. Records will be kept of all payments and include details of the cheque number, nature of the payment and the payee
6. Confirmation that the goods or services have been received shall be obtained

### **6.6 Payments in cash (Petty Cash Policy) or by pre-loaded cash card**

1. Pre-loaded cash cards shall not be used
2. Cash payments shall be for small amounts only and paid out of a petty cash float if created
3. Details of payments are recorded in a petty cash book or online ledger
4. Supporting documentation for the payment is authorised by someone other than the person who maintains the petty cash, or the person making the payment
5. Petty cash and all records shall be kept securely
6. An independent person carries out regular checks of the petty cash float at least once a year
7. An independent person checks and authorises cash withdrawals

### **6.7 Paying wages and salaries**

Payroll can be delegated to an outside Company or organisation with the recorded agreement of the Governors subject to the following

1. All records required by HMRC of PAYE, National Insurance and Pensions should be kept
2. All required deductions are made from the wages and salaries of employees
3. Statutory deductions are paid to HMRC as required
4. Pension contributions are paid to the pensions' provider promptly
5. All legal obligations relating to pensions are met
6. Deadlines for year-end returns to HMRC are met including P35, P11D and P60
7. The data required for 'real time information' submissions to HMRC shall be submitted to them on time
8. At all times the law on minimum wages is complied with
9. Only authorised or required deductions are made from pay
10. Each employee has a written contract of employment or Written Statement of Employment
11. Data protection requirements are met

Also

- Bethany School shall store staff personnel records separately from pay records
- Bethany School shall promptly notify and authorise those operating the payroll of starters and leavers; changes to pay, hours, any overtime or non- standard hours; staff sickness or staff maternity or paternity leave
- Periodic checks shall be made to make sure no one is paid who is no longer an employee, or no existing employees are paid the wrong salary
- All pay, benefits or terms of employment shall be agreed by a vote of the Governors
- All wages and salaries shall be by BACS where possible

### **6.8 Payment or reimbursement of expenses including Governor Expenses Policy**

Bethany School will refund payments which a Governor, member of staff or volunteer has had to meet personally to carry out their duties for Bethany School in the form of an Expenses payment.

- All Expenses will be in accordance with the agreed budget
- Receipts should be sent to the Treasurer
- These will be refunded by a bank transfer
- The mileage rate for motor travel is 45p in accordance with HMRC

### **Governors Expenses Policy**

Claims for, and payment of, expenses must be consistent with the following principles:

1. Expenses are refunds by the school of payments which the Governor has needed to meet personally in order to carry out his or her Governors duties. They are not payments for services.
2. Expenditure should be made by the most cost effective means available and in most cases should be agreed in advance.
3. The expenses incurred must not be of a standard or nature which would constitute a personal benefit to the Governor e.g. elaborate meals, first class rail travel.
4. Evidence must be provided that the expenditure has been incurred. Every expense claim should be fully supported with tickets and receipts.
5. Expenses are not allowable for the costs of partners who attend a school or related event with a Governor.

Allowable expenses include

- the reasonable cost of travelling on Governor business
- the cost of postage and telephone calls on school business.

Process for claiming expenses

All expense claims shall be sent to the Treasurer.

See also Section 7 Payments to Related Parties and Section 10 Internal financial controls for hospitality, including gifts

### **6.9 Expenditure on grants**

Bethany School does not make Grants.

## 7. Internal financial controls for payments to related parties

Bethany School may make payments to a person or organisation connected to Bethany School.

- Where that person is a Governor, or an organisation connected to a Governor, specific authority to make the payment will be given by a vote of the Governors.
- An organisation could be connected to Bethany School because it is a company that is controlled by one or more Governors.
- Bethany School's governing document should be complied with in paying Governors or paying people or organisations connected to Governors.
- Governors must be satisfied that it is in Bethany School's best interests to make these types of payments. For example, they should not use a company controlled by a Governor to provide a service simply because it is the easiest option.
- Any such payments should be in compliance with Section 10 Internal financial controls for hospitality, including gifts and the Conflicts of Interest Policy.

See Guidance on [trustee expenses and payments](https://www.gov.uk/government/publications/trustee-expenses-and-payments-cc11/trustee-expenses-and-payments#s4-3)

( <https://www.gov.uk/government/publications/trustee-expenses-and-payments-cc11/trustee-expenses-and-payments#s4-3>) and [managing conflicts of interest in a charity](https://www.gov.uk/guidance/managing-conflicts-of-interest-in-a-charity) (<https://www.gov.uk/guidance/managing-conflicts-of-interest-in-a-charity>).

## 8. Internal financial controls for assets and investments

### 8.1 Tangible fixed assets

These include the following which are used during Bethany School's activities:

**land buildings vehicles**

**fixtures and fittings equipment**

Governors have a duty to safeguard Bethany School's assets and make sure they are being used properly. These should be

- identified
- recorded in accounting records
- used for Bethany School's purposes

Bethany School shall

- include in the accounts all fixed assets and allot an appropriate value to them including small items
- Have a register of all fixed assets Bethany School uses, including the cost, or value, of each asset and have enough detail to enable each asset to be identified
- regularly inspects fixed assets to ensure that they still exist, are in good repair and are being used appropriately
- authorise the disposal or scrapping of fixed assets appropriately and record this in accounting records and in the fixed asset register
- regularly reviews the insurance cover to make sure it is adequate
- secure the boundaries of any land and buildings and make sure they are recorded appropriately with the Land Registry
- hold any title deeds to land securely and check that the deeds accurately record Bethany School's interest in the land

### 8.2 Intangible fixed assets, such as intellectual property rights

All data and information will be kept in accordance with the Data Protection Policy

### 8.3 Restricted funds and endowment funds

All Restricted Funds shall be used according to the purpose they were given and accounted for to the Independent Examiner

At the moment there are no endowment funds

#### **8.4 Investments/Investment Policy**

Our school relies on donations and income from events and usually expects to use these monies within 1 year of receipt except for Reserves or other designated funds. At the moment we have no Endowment Funds. We would only therefore be looking at short to medium term Investment and so would not be looking to Invest in stocks and shares at the moment.

#### **Investment Objectives**

Our investment objectives at the moment are to achieve income.

#### **Risk**

We recognise that every investment carries risk, but as our income is from donations, we seek to minimise the risk by using savings and Investment accounts up to the guaranteed limit of £85,000.

#### **Amount Available**

We will invest our financial resources in line with our objectives, risk appetite, and investment policy. We will use easy access and limited access accounts with the best rates to allow us to accommodate the charities operating costs and expenditure.

#### **Investment Time Horizon**

Our investment time horizon is short-term.

#### **Liquidity Needs**

We will ensure that our school has sufficient liquidity to meet our financial commitments. We will invest in liquid assets and maintain an appropriate level of cash reserves to ensure that we can access our money when we need it.

#### **Types of Charity Investments**

We will consider investing in ethical accounts that align with our charitable mission.

#### **Decision-Makers**

The Governors are responsible for making investment decisions, including approving the investment policy and will take expert advice when appropriate.

#### **Investment Key Performance Indicators**

We will review our savings performance regularly and adjust our investment strategy as necessary.

#### **Investment Responsibilities of the Governors**

The Governors have a legal obligation to secure the best financial return within the appropriate level of risk to be spent on the school's aims. They have a duty to consider investment suitability and diversification, to take advice, unless there is good reason for not doing so, and to review investments/savings.

#### **Conclusion**

This investment policy sets out our approach to investing. It is a framework for making investment decisions, managing our financial resources, and meeting our governance responsibilities. We will review our investment policy annually with the Financial Controls Policy to ensure that it continues to align with our charitable mission and objectives.

See [Charities and investment matters: a guide for trustees \(CC14\)](https://www.gov.uk/government/publications/charities-and-investment-matters-a-guide-for-trustees-cc14)

[\(<https://www.gov.uk/government/publications/charities-and-investment-matters-a-guide-for-trustees-cc14>\)](https://www.gov.uk/government/publications/charities-and-investment-matters-a-guide-for-trustees-cc14) to understand the legal duties that apply when making investments.

#### **9. Internal financial controls for loans**

No loan may be made or received without appropriate advice taken, a decision of the Governors and relevant Policies and Procedures being in place.

## **10. Internal financial controls for hospitality, including gifts**

In the event of any hospitality or Gift given or received by Governors, Staff or the Treasurer consideration should be given to

- Whether it is justified
- Is not detrimental to either the school or its reputation.
- Whether it helps you deliver the school's work
- whether it is reasonable
- whether it gives rise to more than incidental personal benefit
- whether it poses any risks to the school's reputation,
- Could be viewed by others as excessive or unnecessary

Any hospitality given or received should be seen to be fair, honest, and open. Any benefits of any kind should not reasonably be seen to compromise the school's integrity nor give an impression of inappropriate influence. All gifts or hospitality should be reasonable and proportionate. No hospitality should be given or accepted, which either is, or could be seen to be, a bribe, a corrupt payment or to secure preferential treatment.

Gifts and hospitality given or received (over the value of £20) should be declared as part of the Declaration of Interests Form and process

## **11. Audit**

11.1 Internal audits – Bethany School shall work towards the creation of a School Risk Statement

11.2 All finances shall be Independently Examined/audited in accordance with the legal requirements

## **12. Internal financial controls checklist**

Bethany School shall work towards having all necessary checklists and controls  
[ment data/file/1150879/Checklist Internal financial control for charities.odt](#)

See:<https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attach>

**Appendix 1**  
**Bank Accounts and Mandates**

**2025/26**

**Bank Accounts held and operated by Bethany School in the name of Christian Family Schools Limited**

CAF Bank Account – Current Account

Account no: 00007356

Sort code: 40-52-40

Deposit Accounts

CAF Bank

Deposit ("Friends") Account

Account No: 00007355

Sort Code: 40-52-40

CAF Bank

Deposit ("Gold") Account

Account No: 00083401

Sort Code: 40-52-40

**Bank Mandate agreed by Governors**

**CAF Bank – Current Account**

Ian Pike

David Charles

Ben Udejiofo

**Deposit Accounts**

Ian Pike

David Charles

Ben Udejiofo

**Business Card Holders**

David Charles

Sarah Walker