

Financial Control Guidance for PCCs

What is in this document?

This document is designed to help you understand the basic requirements to ensure good financial management in your church. It can also act as a reference guide for creating a Financial Control Policy (FCP).

It is very important to note that **this is not a definitive guide**, it merely provides an introduction to the basic requirements for most PCCs. At the end of this booklet there are further resources which you should consult. These provide a much more detailed breakdown of the topics covered here whilst also expanding on more specific areas of governance not included in this document.

You may find that you do not need all the recommendations in this booklet (e.g., you may not have investments) but it is recommended that you read the whole document to ensure you do not overlook any areas of governance. Accompanying this document is a risk-assessment checklist (PCCFC2) to help you highlight areas of risk in your church.

If you wish to discuss the individual financial control needs within your church, please speak to the Parish Finance officer.

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1. Why do PCCs need financial controls?

All PCCs¹ in the Church of England are independent charities accountable to the Charity Commission.² All PCC members are trustees of the charity³ which means that they have the duty of overseeing and governing the church and ensuring that finances are handled correctly and in a manner which corresponds to the aims of the charity.

PCC Members are ultimately responsible for ensuring that the finances of the church are used to further its aims and that policies are put in place to allow the long-term health and growth of the resources available for ministry as well as avoiding misuse of the finances.⁴

Writing a financial control policy (FCP) will allow you to show how you are maintaining good financial oversight as well as detailing who is accountable when something goes wrong. Example FCPs are available from the Parish Finance officer.

2. General Accounting Principles and Reporting

Charity accounting is based on the principle that money must be used in line with the stated purpose for which it was given. This gives rise to *fund accounting* which records what purpose money was given for and how it can be spent/distributed.

PCC accounts can have up to three fund types - unrestricted (which can be general and designated), restricted and endowment. Not all PCCs will have all three fund types. These fund types can be described as:

- General - money that can be used for any purpose that furthers the aims of the charity. This money is a type of **Unrestricted Fund**;
- Designated - money that has been set aside by the PCC to cover any predicted future costs. This money can be transferred back into the general fund by the PCC and is therefore a type of **Unrestricted Fund**;
- **Restricted Fund** - money that has been given for a specific purpose (e.g. roof repairs) and can only be used for that purpose;
- **Endowment** - an amount of money that has been given to the church, usually, but not always, in a will. Generally, endowments come with an agreement that the investment income generated by the endowment can be spent on the church or for a specific [*restricted*] purpose.

¹ This document is designed to help PCCs to consider financial controls. PCCs are the governing bodies of parish churches. The guidance in this document can apply to other types of worshipping community e.g., BMOs.

² PCCs in the Church of England are excepted from registering as charities unless their income is over £100,000. Even if a PCC is not registered with the Charity Commission it is a charity and must abide by all relevant charity law, Charity Commission guidance, and Canon Law.

³ "PCC Member" is used throughout this document to indicate a trustee of the church (PCC). A PCC that is a registered charity must inform the Charity Commission whenever there is a change to the PCC Membership. This most often occurs at the APCM and the changes can be entered as part of the Charity Commission annual return.

⁴ Types of misuse are not covered in this document. If you suspect misuse of church funds you must speak to your Archdeacon who will help you investigate and, where substantiated, refer the matter to the police and the Charity Commission.

It is not necessary to have a bank account for each fund. All money can be kept in one account so long as it is clear in your accounting records how much money is in each fund.

There are two aspects to account **reporting**:

1. PCC Updates - the PCC should receive a financial update every meeting.⁵ This is to allow PCC members to act in their capacity as trustees and give them the opportunity to question how the church's money is being utilised. This update need not be a full set of accounts but should, as a minimum, include:
 - a. Details of cash flow, fund balances and any projected deficits;
 - b. if there have been any large/unusual payments or incomes (receipts);
 - c. how well the PCC is keeping to budget(s);
 - d. if there is a shortfall in income, including giving.
2. Statutory Annual Accounts - these will be a full set of accounts prepared according to either the Receipts & Payments or Accruals accounting methods⁶ which will form part of the PCC's Annual Report (see Church Representation Rules, 9: 1-3). These will be a matter of public record and must be made available to anyone who asks for a copy. Registered charities will also need to upload them to the Charity Commission website.

3. Handling Cash

Cash is an integral part of church giving. Despite the advances in modern banking technology, envelope and plate giving remain a staple source of income for many churches.

That said, cash is a labour-intensive medium and the PCC may want to put thought to writing a donations policy which includes how the church will move away from being cash based to being more digital.⁷

Whatever the reason for collecting cash, when handling it you should always:

- ✓ record what is given on the day it is received;
- ✓ have two unrelated people present when counting - the first person counts and records then the second person recounts to ensure the first count was accurate. These should happen at the same time;
- ✓ ideally have a roster for the counting so that it is not always the same two people counting the money;
- ✓ record the purpose for which the money is given;
- ✓ detail how the money was received e.g., donation, book sale, hall rental etc.;
- ✓ detail the names and amounts given by those who have signed a Gift Aid declaration to ensure the associated tax can be claimed;

⁵ PCC Members have the right to scrutinise all aspects of the charity's finances. That said, PCC Members should be reasonable when asking to see the accounts and allow finance officers/treasurers enough time to prepare answers to complicated questions. It should also be noted that treasurers have a data protection duty.

⁶ This document will not detail the difference between the accounting methods. If you need advice on which method to use and how to use it, please see *PCC Accountability: The Charities Act 2011 and the PCC (5th Edition Incorporating SORP 2015)* (London: Church House Publishing, 2017). An online copy can be found [here](#). You can also speak to the Parish Finance officer at the Diocese. Accounting records must be kept for six (plus the current) years.

⁷ Most churches will want to make provision for cash giving but will also want to signal to regular donors that digital giving is the preferred method. For more information on digital giving please speak to a member of the giving team at Trinity House.

- ✓ note the amounts received of each cash denomination for GASDS claims;
- ✓ store all cash (including petty cash) in the safe and/or in a locked box with limited access;
- ✓ bank all the incoming cash.

NB:

- ✓ it is not necessary for two people to take the cash to the bank; one person is sufficient however the amount banked (on the paying in slip and/or bank statement) should always be reconciled to the cash record sheet;
- ✓ cash record sheets and paying in slips should be kept for six (plus the current) years, along with all accounting records.

Holding a Cash Float (Petty Cash Policy)

It is not best practice to keep a cash float however if you do choose to have one good practice will include:

- ✓ keeping a detailed reason why you have a cash float;
- ✓ detailing exactly what the maximum amount held in cash should be at any one time (usually between £25-£50);
- ✓ if you are topping up the float from incoming cash you should record the amount transferred to the float and proof that it came from the general fund in the accounts. This should then be reconciled with the amount paid into the bank;
- ✓ any payments from cash must be based on an invoice and accompanied by a signed (or printed) receipt. Staff should not be paid via cash;
- ✓ you should regularly reconcile the float with the amount stated in the accounts.

4. General Banking Guidelines

It is important to set safeguards to ensure the security of the money held by the PCC. These should include:

- ✓ an up to date list of all bank accounts held. NB As mentioned earlier, you do not need a bank account for each individual fund. You should provide justification for each bank account (including savings accounts) and work to minimise these. Most PCCs will have a maximum of 1-2 current accounts and 1-2 savings accounts;
- ✓ monthly bank reconciliations;
- ✓ a commitment to confirm accuracy of direct debits, standing orders and other transfers during the reconciliation;
- ✓ a commitment to never transfer or hold money for a private individual or third party (except collections for other charities);
- ✓ a commitment to keep bank accounts in accordance with the rules of the operating bank;
- ✓ keeping a list of all signatories which has been approved by the PCC.

5. Online Banking

Online banking is fast becoming the primary means of monitoring accounts in the UK. This comes with a unique set of challenges that did not exist twenty years ago when all banking was done by cash and cheque. Making payments online will be covered in section 6 but some initial safeguards for online banking are detailed here:

- ✓ at least two people should have access to the online bank account system at any one time. You should detail exactly which PCC Officers have access;
- ✓ you should be wary of emails from your bank and should never respond to an email asking for personal details, banking passwords or card numbers;
- ✓ passwords should be changed as soon as one person is no longer allowed access to the accounts. You may also wish to set regular intervals to change the passwords. Passwords should never be written down;
- ✓ online banking card readers and bank cards should be stored securely and independently (preferably not in a private residence) with access available to all those with permission to use the online banking. Cards should be cancelled as soon as one person is no longer eligible to use them.

6. Paying an Expenditure

Payments to third parties can be via four methods - bank transfers, card payment, cheque or cash. Each comes with its own set of safeguards which are detailed below. Payment policies should be designed to allow smooth running of the church whilst minimising risk. Some overarching safeguards are:

- ✓ you should detail an amount on the FCP above which payments must be authorised by the PCC
- ✓ you may also want to detail an amount lower than the above, over which an invoice must be initialled by two PCC Members before payment (but does not require the authorisation of the full PCC). Preferably neither of the initialers should be the same as the person making the payment
- ✓ no-one may authorise or co-sign payments to themselves
- ✓ payments for services should never be made without an invoice or bill.

Cash

- ✓ Cash payments should be avoided where possible
- ✓ if payment must be made by cash please see the principles under the “Holding a Cash Float (Petty Cash Policy)” section 3 (page 6)
- ✓ you should not pay an invoice/expense directly from incoming cash

Cheque

- ✓ Best practice is to require signatures from two signatories on all cheques: who can sign cheques should be agreed by the PCC and the mandate kept up to date accordingly. You should also note their names on the FCP;
- ✓ authorise at least three signatories in case one becomes unavailable;

- ✓ if you have a mandate that allows one person to sign cheques for specific amounts then the maximum amounts should be detailed and justification given with reference to the need for day to day running of the church;
- ✓ you must **never** sign blank cheques;
- ✓ cheque books should be kept securely and independently and should be accessible by more than one person (those with access should be detailed).

Card

It is perfectly legitimate for PCCs to use debit or credit cards if there is a reason to do so, as long as there are sufficient controls in place. The PCC should discuss the risks of using cards (e.g., that one person can make unauthorised purchases) and minute that they still wish to have them.

If you do need the use of one or more card sensible controls include:

- ✓ detail who is eligible for a card and what purposes they can use it for;
- ✓ church debit/credit cards should never be used for personal purchases;
- ✓ detail how much card holders can spend without approval from another bank signatory and/or the PCC;
- ✓ you may want to detail maximum spending amounts per calendar month;
- ✓ ensure receipts are kept for all transactions and provided to the bookkeeper/treasurer for the monthly bank reconciliation;
- ✓ collecting and destroying a card once its holder is no longer eligible to use it (also destroying any unwanted cards sent automatically by the bank).

Online Banking Payments

Best practice is to use a bank that requires authorisation from two people however this is not always possible. If you opt to use a bank that requires authorisation from only one person, the PCC should discuss the associated risks and formally minute (with a justification) that they wish to use online banking.

- ✓ all invoices must be seen and initialled by at least two PCC members (preferably these will not include the person making the payment) before payment is made
- ✓ frequent reviews should be undertaken to reconcile payments to the accounts and invoices to ensure the above is being adhered to
- ✓ summaries of all online banking payments should be stored as part of the accounting records. These should include the name of the payee, the payment date, and a reference (number/code) to the invoice.

7. Paying Staff and Expenses

There are mostly two types of staff: those who are directly employed by the PCC, and self-employed contractors.⁸ For the PCC the main difference between these two is the burden of tax. With employees the PCC is required to manage the PAYE tax, National Insurance (NI),

⁸ There are various indicators which point to someone being an employee or being self-employed. You can find a list of these indicators on the government [website here](#). If you would like further advice, you can ring the Diocesan Finance team. You may be encouraged to seek legal advice.

auto-enrolment pension and other benefit liabilities. Self-employed contractors manage these themselves.

- ✓ You should detail whether the PCC will have direct employees, self-employed contractors or a mixture of both;
- ✓ you must communicate the burden of tax to all self-employed contractors. You should also record their NI number and, if possible, proof that HMRC consider them to be self-employed;
- ✓ you should endeavour to make all payments by online banking. BACS is the preferred method for regular staff. Cash should be avoided where possible;
- ✓ you should detail who is responsible for all payroll, HMRC liabilities & requirements, and pension requirements (this can be an external agency);

Following a [2018 amendment](#) to the PCC (Powers) Measure 1956 which repealed section 3A, PCC Members can become employees. This should only occur if it is in the financial interest of the PCC. You must seek permission from the Charity Commission before employing relatives of PCC Members ([see here](#)). Any employed or contracted PCC Members should absent themselves from meetings when their employment/contracts are being discussed.

Some notes on employment status:

- ✓ If someone is required to a) attend a set premises (e.g. a church building/office); b) work for or during set hours; or, c) use equipment provided by the PCC (e.g. a laptop, organ, or cleaning equipment) then HMRC may consider them an employee;
- ✓ HMRC may consider someone an employee, and therefore penalise the PCC for not covering tax liability, even if one or both of the following apply:
 - a. the person has signed a declaration stating they are not an employee
 - b. the person submits regular timesheets;
- ✓ it is worth noting that recent interpretations have suggested that organists and church cleaners are both likely to be employees.

Expenses

It is the PCC's duty to pay reasonable expenses accrued in the running of the church. These include (but are not limited to) the incumbent's expenses, PCC Members' expenses and visiting clergy expenses.

- ✓ You should detail what you will pay expenses for⁹ and how you require expenses requests to be submitted;¹⁰
- ✓ you may want to set a deadline for expense claims (e.g., three months after the expense) however this is not a requirement;
- ✓ you may want to detail how you will pay expenses e.g., expenses will only be paid by bank transfer;
- ✓ you should comply with the Church of England's *Parochial Expenses of the Clergy* policy. The latest version can be found [here](#).

⁹ This just needs to be a general statement such as "the PCC will pay the reasonable expenses to [X] for costs generated in carrying out their duties in the running of the church."

¹⁰ If you don't have a set claim form you should be clear what evidence (e.g., receipts) you require with submissions.

8. Borrowing Money

PCCs can borrow money where to do so is in the long-term interest of the charity. All loans should be discussed and approved by the PCC.

- ✓ Money can be borrowed for a variety of purposes including mortgages for purchasing property and repairs to the church building;
- ✓ before undertaking to borrow any money, you should:
 - a. Be clear why you want to borrow money, how much you wish to borrow, and for how long;
 - b. Prepare a clear and robust repayment plan including an assessment of future cash flow;
 - c. Assess the reputation of the potential lenders;¹¹
 - d. Ensure there is a clear agreement/contract in place (especially if the lender is a congregant);
- ✓ outstanding loans must be clearly shown in the statutory annual accounts.

9. Making Donations to other Charities

PCCs may find themselves making payments to other charities if either they have collected money on behalf of another charity or they would like to make a donation from the general fund (e.g., for a disaster relief effort or a regular tithe).

- ✓ Money collected on behalf of other charities will need to be recorded in the accounts either as an agency or as a restricted fund;¹²
- ✓ payments from existing funds to another charity (as opposed to holding a specific collection) must be authorised by a PCC resolution;
- ✓ you must record that you have examined the justification for the donation and how the recipient charity's aims align to those of the PCC;¹³
- ✓ you must provide satisfactory evidence that by transferring funds you are not being a party to money laundering;
- ✓ if the PCC makes a regular donation to another charity you should
 - a. detail the justification for this & renew the commitment with a PCC resolution on an annual basis; and,
 - b. appoint someone to provide regular reports on the effectiveness of the donation to ensure that the money is being used appropriately and in line with the wishes of the PCC ([see here](#) for further guidance);

¹¹ High street banks are not always well suited to lending to charities. PCCs will need to consider the terms being offered carefully. The Diocese can provide small interest-free loans of up to £40k and larger interest-bearing loans up to £250k. You should discuss the possibility of a loan with your Archdeacon.

¹² Advice on the difference between agencies and funds restricted to other charities can be sought from the Diocesan Finance team.

¹³ A PCC can make a donation to another charity as long as a) the money comes out of an appropriate fund (almost always the general fund), and b) the recipient charity's aims align with and do not contradict the aims of the PCC. For example, the PCC could make a donation to a local night shelter on the argument that it is in line with the aims of the church to be of benefit to the local community however if the night shelter denied support to Christian people, then the donation would not be justified as the shelter contradicts the aims of the PCC to further the Christian spiritual life of the parish.

- ✓ you should record the donation in the annual accounts as well as making donors to your church aware (as far as is reasonable) of the donation.

10. Budgets, Reserves and Legacies

Budgets are an essential tool to ensure that you are spending resources in an appropriate and considered way as well as setting targets for growth and income generation. Budgets can be as simple as a few lines detailing income and expenditure or can be very detailed analyses of different areas of income and expenditure e.g., regular giving, mission expenditure, youth expenditure etc.

- ✓ You should detail when annual budgets will be agreed (usually October/November of the preceding year);
- ✓ you should split budgets into reasonable periods (usually monthly or quarterly) to allow monitoring throughout the year;
- ✓ you should provide updates against budgets at every PCC meeting;
- ✓ you should detail who is responsible for managing each budget area.

Reserves are amounts of money kept back by the PCC for unforeseen expenditure. This money is a designated (*unrestricted*) fund that can be used for any purpose.¹⁴

- ✓ Under Charity law it is mandatory to have a reserves policy which details how much you want to keep. It should be reviewed annually;¹⁴
- ✓ Your policy should provide a justification for reserving funds and detail acceptable reasons for drawing on the funds. You cannot keep reserves without a stated purpose.

Legacies are amounts left to the PCC in a will. They can provide large, one-off payments to a PCC to support the mission and up-keep of the buildings.¹⁵

- ✓ Every PCC should have a legacy policy detailing reasons to give to the church and how you would use any money;
- ✓ a PCC may wish to appoint someone as a legacy officer to encourage congregants to leave legacies in their wills;
- ✓ policy ideas can be found on the [Church Legacy website](#).

11. Fixed Assets, Investments and Trustee Donations

Fixed assets are valuable tangible items owned by PCCs, such as printers, church halls and flats. All of these must be recorded in the PCC accounts.¹⁶

- ✓ The PCC will need to decide a level over which fixed assets will be included in the accounts. This is usually around £1,000. Any purchases of assets under this threshold should be treated as an expenditure in the year of purchase;

¹⁴ See also: Charity Commission guidance [here](#) and Stewardship for sample reserves policy to purchase [here](#)

¹⁵ PCCs do not have to accept a legacy [or any donation] if it comes with conditions that would be detrimental to the mission of the church.

¹⁶ If you need help identifying if something is a fixed asset or how to record it in the accounts, please speak to the Diocesan finance team.

- ✓ if a treasurer is uncertain how to depreciate a fixed asset¹⁷ then this must be agreed by the PCC;
- ✓ the PCC must include details of how they safeguard the fixed assets including property security and insurance which must be reviewed on a regular basis;
- ✓ property leases (including domestic flat rentals) and property purchases MUST be agreed and co-signed by the Southwark Diocesan Board of Finance;
- ✓ property rented out by the PCC must have a valid Energy Performance Certificate (EPC) with a grade of E or better. Details about this can be found on gov.uk along with the procedure for [obtaining an EPC](#);
- ✓ property must be regularly inspected to ensure that it is in good condition;
- ✓ church silver (including chalices, collection plates etc.) do not need to be recorded as fixed assets in the accounts.

Investments most often consist of an endowment fund held with a private investment company (e.g., [CCLA](#) or [M&G](#)). The Charity Commission has strict policies on charities undertaking commercial investments so if you need advice on investing you should speak to an independent legal professional and/or a registered financial adviser.

- ✓ All investments must be included in the accounts (bear in mind that some stocks and shares may be fixed assets depending on how long you intend to hold them);
- ✓ You should detail how you will use the income from any investment (even if you wish to add it to the general fund).

Trustee Donations means any money given by PCC Members (or close relatives) to the PCC. You must record in the annual accounts any PCC Member donations that make a substantial difference to the PCC income; both one-off donations and/or total regular-giving donations.

12. [Vacancy](#)

When an Incumbent leaves or retires, the parish enters a period of vacancy. In financial terms a process called Sequestration is activated. This is when certain people (usually the Churchwardens and the Area Dean) are appointed as Sequestrators who are given the duty of ensuring services are maintained and property is cared for throughout the *vacancy*.

In a vacancy the main areas that impact on the finances of the parish relate to:

1. The vicarage - During a vacancy, the churchwardens are responsible for the safety and security of the parsonage house of the parish, when it is empty. The Property Department at Trinity House are ready to help and advise (020 7939 9400).
2. The church buildings - The churchwardens and PCC remain responsible for the maintenance of the fabric of all their church buildings during a vacancy. The wardens continue to have the legal ownership and custody of the moveable goods belonging to the church.
3. Parish pledge, fees and expenses - Parishes should maintain payment of their Parish support fund pledges throughout the vacancy.
Any proportion of fees due to the Diocese for weddings and funerals carried out during the vacancy should continue to be paid to the Diocesan Board of Finance as usual.

¹⁷ Depreciation is only required in accruals accounting. PCCs that use Receipts & Payments accounting do not need to depreciate assets but should record an up-to-date valuation of significant fixed assets in the annual accounts.

Travelling expenses should be offered to all clergy and Readers who travel from another parish to help out during the vacancy. Only retired stipendiary clergy should be paid fees for duty and these are set out in the Diocesan booklet, 'Pay and Conditions of Service'. These payments are the responsibility of the parish.

13. Sending Money Abroad

Sending money abroad can be complicated and is best avoided where possible. That said, some PCCs will have a need to send money abroad, often in support of missionaries or evangelists. Before sending money abroad you should undertake a risk assessment and obtain PCC approval. You should also make sure that your bank is aware. Most importantly you must be able to prove to the Charity Commission and police that you are not wilfully or accidentally being a party to money laundering. NB See also section 9 on donations to other charities.

14. Further Resources

Financial Controls in Churches and Small Charities (Stewardship)

A resource provided by Stewardship that more or less covers the same material as this document but in a bit more detail. It is worth a read if you want to build your understanding of financial controls.

Charity Commission Checklist

This is a yes/no governance checklist provided by the Charity Commission which you can fill in to see if you are in line with the guidance provided by the Commission. You may want to work through this over the space of a few PCC meetings.

Internal Financial Controls for Charities (CC8)

This long document is the official guidance from the Charity Commission detailing numerous suggestions for financial controls. It builds on the subjects covered in this document as well as covering areas not included here. It also, unlike this document (PCCFC1), distinguishes between legal requirements and best-practice suggestions [the latter not necessarily being legal requirements].

Please remember that this document is not a definitive guide but simply suggests best-practices for the most common areas of finance. Please also note that an FCP is not the only required policy, for instance others may include GDPR, safeguarding, health and safety etc.

Appendix: Links in this Document

Diocesan Finance Team can be contacted individually or via: southwark.anglican.org/about-us/who-we-are/diocesan-staff/.

Online PCC Accountability:

www.parishresources.org.uk/wp-content/uploads/PCC-Accountability-5th-Edition.pdf

Employment Status:

www.gov.uk/employment-status

Amendment to PCC Powers Measure 1956:

www.legislation.gov.uk/ukcm/2018/7/section/14

Employing Relatives of PCC Members:

www.gov.uk/guidance/payments-to-charity-trustees-what-the-rules-are#pay-a-trustee-to-do-work-for-the-charity

Parochial Expenses of the Clergy Guide:

www.churchofengland.org/sites/default/files/2017-10/parochial-expenses-guide-2017.pdf

Grants to other Charities:

www.stewardship.org.uk/downloads/briefingpapers/do-you-know-how-your-grants-are-being-used.pdf

Reserves:

1 <https://www.gov.uk/government/publications/charities-and-reserves-cc19/charities-and-reserves#annex-1-a-simple-approach-to-developing-a-reserves-policy>

2 <https://www.stewardship.org.uk/resource/policies-churchescharities-reserves>

Church Legacy Website: www.churchlegacy.org.uk

Energy Performance Certificates:

1 www.gov.uk/guidance/domestic-private-rented-property-minimum-energy-efficiency-standard-landlord-guidance

2 <https://getting-new-energy-certificate.digital.communities.gov.uk/>

CCLA Investments: www.ccla.co.uk

M&G Investments: www.mandg.co.uk

Financial Control Papers:

1 Stewardship:

www.stewardship.org.uk/downloads/briefingpapers/Financial-controls-in-churches-and-small-charities.pdf

2 CC Checklist:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/585893/CC8_Checklist.pdf

3 CC8 Guidance:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/746765/CC8.pdf