

Local Voluntary Support Groups Finance, Fraud and Fundraising Policy

Local Group Finances

1. Overview

1.1 All money raised in the name of the Charity and held by the Local Group in its bank account, is part of the Charity's general funds. To comply with requirements laid out by the Charity Commission and the Board of Governors, Coeliac UK must be able to demonstrate that money raised and spent by the Charity's Local Voluntary Support Groups is spent on furthering the Charity's objectives.

1.2 Coeliac UK is committed to providing ongoing support to its volunteers. Such can be accessed through the Volunteer Team (volunteering@coeliac.org.uk) or the Charity's Finance Department (finance@coeliac.org.uk)

1.3 The Local Group must:

1.3.1 be self funding

1.3.2 comply with all legal requirements and codes of practice applicable to the chosen method of raising funds (for further guidance speak to Fundraising at Coeliac UK)

1.3.3 refer to the Handbook and comply with the Charity's guidance about the use of the Charity's registered number and logo

1.3.4 not to raise funds for or promote other charities under the Local Group name

1.3.5 not make a donation to other charities out of the Local Group funds

1.3.6 not apply for grants from any other bodies

1.3.7 not raise funds for any specific purpose unless the Charity has approved, in writing, the wording of the appeal

1.3.8 return any funds raised on behalf of Coeliac UK to the High Wycombe office within two months of the funds being raised

1.3.9 not claim Gift Aid on the donations they raise

1.3.10 not commit to invoices to be paid by the Charity, unless the Local Group has obtained written permission for such from the Coeliac UK Finance department

1.3.11 not engage in taxable trading.

2. Managing the Local Group finances

2.1 Local Groups can only use a Lloyds charity bank account, set up by Coeliac UK, to manage the Local Group's funds.

2.2 Each Local Group bank account must have at least three signatories, one of whom should be the Treasurer.

2.3 Local Group signatories cannot be related or live at the same address.

2.4 All signatories must have completed and returned the Declaration of Eligibility form and, if appropriate, the Declaration of Interest form.

2.5 All cheques and payment orders must be signed by two signatories.

2.6 The Local Group must not incur a bank overdraft or commit expenditure beyond its resources.

2.7 Debit cards are currently not available as they do not require two signatories and as such expose the Local Groups to fraud.

2.8 Paypal, Apple Pay and other services cannot be used by the Local Group as they do not require two signatories and expose the Local Groups to fraud.

2.9 The Lloyds bank account includes dual authorization internet banking with the ability to make electronic payments.

3. Role of the Local Group Committee

3.1 The Local Group Treasurer is responsible for keeping account of the finances of the Local Group however the whole Committee has responsibility for Local Group monies.

3.2 At each Committee meeting, the Treasurer and/or the Local Group Organiser must present a statement (written or oral) of the accounts of the Local Group.

3.3 A financial statement must also be presented at the Local Groups' Annual General Meeting (AGM)

3.4 At the end of the financial year (31st December) the Treasurer must provide a summary financial return and duplicate bank statement to the Coeliac UK Finance Department. The Charity will send a letter with further details at the time.

3.5 Any money held in the Local Group bank account which amounts to more than 24 months of average Local Group expenditure will be recorded as "excess funds" and the Local Group will be required to submit a Finance Plan to show how and when these funds will be spent and how they further the aims of the Charity and the Charity's Local Groups.

3.6 The Finance Plan must be approved in writing by the Charity.

3.7 If the Local Group does not have a clear plan for spending these reserves locally they should be transferred to the Charity's central bank account.

4. Local Groups and Fraud

4.1 Coeliac UK is committed to the prevention of fraud and the promotion of an anti-fraud culture and operates a zero tolerance attitude to fraud.

4.2 Coeliac UK will investigate all instances of suspected, attempted and actual fraud and will seek to recover funds and assets lost through fraud. Perpetrators will be subject to disciplinary and/or legal action.

4.3 The Charity's fraud policy is endorsed and supported by the Board of Governors and Chief Executive

4.4 The term "fraud" is used to describe the use of deception to deprive, disadvantage or cause loss to another person or party. This can include theft, bribery, embezzlement, collusion, the misuse of funds or other resources for more complicated crimes such as false accounting, money laundering and the supply of false information

4.5 Individuals can be prosecuted under the Fraud Act 2006 if they make a false representation, fail to disclose information or abuse their position.

4.6 Volunteers are responsible for:

4.6.1 ensuring that Coeliac UK's reputation and assets are protected against fraud

4.6.2 identifying and assessing the risks of fraud involved in the operations they perform

4.6.3 adhering to agreed policies and procedures

4.6.4 reporting known or suspected fraud

4.6.5 assisting in the investigation of suspected fraud.

4.7 Volunteers must report concerns about suspected, attempted or actual fraud to the Volunteer team or the Director of Finance. They should not attempt to investigate the fraud themselves.

5. Local Groups and Fundraising

5.1 Fundraising: the law, key principles and behaviours

5.1.1 When raising funds the Coeliac UK charity registration number (1048167 for England, Wales and Northern Ireland, SC039804 for Scotland) must appear on all posters and advertising materials.

- 5.1.2 It is a legal requirement that all funds raised for a particular cause must be used for that particular cause and therefore any funds raised must go towards furthering the Charity's objectives.
- 5.1.3 all money raised must be used in a timely manner.
- 5.1.4 volunteers must not mislead, criticise, belittle, pressurize or take advantage of donors, individuals, or organisations.
- 5.1.5 when using donor information the Local Group must comply with Data Protection policy.
- 5.1.6 records should be taken for all donations made in sufficient details to identify the donor (unless given anonymously), the amount and the circumstances when the donation was made
- 5.1.7 no deductions can be taken from cash received unless with the express and explicit advanced agreement of the Group Organiser and Group Treasurer (There may be additional rules imposed by donors or third parties which must be honoured.)
- 5.1.8 cash should be collected, counted and recorded by two signatories in a secure environment with cash and cheques being banked as soon as is practical.
- 5.1.9 unsecured cash must never be left unattended and any cash or cheques not banked immediately must be placed in a safe and secure location
- 5.1.10 all Committee Members should know who is responsible for banking donations (usually the Group Treasurer) and be notified once donations have been paid in
- 5.1.11 records must be maintained for each fundraising event, in sufficient detail to identify gross receipts or takings and costs incurred
- 5.1.12 children under the age of 16 must not be given responsibility for handling, counting and collecting money
- 5.1.13 if using a collection tin or bucket at your events it must be secure and tamper proof with the Coeliac UK charity name and registered Charity number clearly labelled.

5.2 Raffles

Raffles are a popular way to add to the Local Group's income line at every event and meeting. Any Local Group holding a raffle must ensure that it complies with the following regulations:

- 5.2.1 the raffle cannot be the main focus of the event or meeting, rather it should be an incidental part of it e.g. at your AGM and coffee morning (this is termed as an 'incidental lottery')
- 5.2.2 tickets can only be sold at the event and the draw must take place at the event too

- 5.2.3 tickets can only be sold to people who are 16 years old or more and they must be present at the event
- 5.2.4 alcohol can only be given as a prize if all those participating in both the event and the raffle are 18 years old or over and if it is a sealed container
- 5.2.5 there must be no roll over of prizes from one raffle to the next
- 5.2.6 money cannot be given as a prize though vouchers are fine
- 5.2.7 deductions from the profits must not exceed £100 in costs and £500 in prizes (not including donated prizes)
- 5.2.8 tickets are non-transferable.

Local Groups MUST contact the Coeliac UK Fundraising team before organising general public collections, house-to-house collections or ticketed events who can provide further information on the required licenses etc. Please also see the Local Voluntary Support Group Handbook for further guidance.