Autumn Briefing

Fraud Case Feedback

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DIOCESE of OXFORD

Agenda – Fraud Feeback Document

- PCC actions
- Treasurer actions
- Independent examiner
- Archdeacon visits and Area team interaction
- Diocese actions

Whilst the items to be discussed in this slide deck are important we would like to acknowledge the fact that the role of all volunteers are essential to the local church and to give a huge thank you to the Treasurers and Church Wardens as well as others who give so much. The intention of these slides and our approach to fraud is to give practical thinking whilst not ignoring the fact that some of the items being discussed may not be able to be fully implemented in all situations. We hope that the spirit and intention of the guidance will be helpful for the protection of our PCCs and Treasurers.

PCC awareness/ training/ engagement/ curiosity on financial matters beyond the Treasurer

- Reminder that PCC members are trustees of a charity
  - Chair of PCC as incumbent must take an active interest (even if not top of skill set)
  - Must ensure that PCC are aware of the rules as laid out by Charity Commission
  - Consider whether some training would be helpful for PCC
- Setting time limits on the period that a treasurer can stay in role
  - no more than six to nine years depending on the size and resources of the parish seems appropriate
  - Understand this is not always practical. PCC to implement “check in” measures where this is not able to happen
- Not allowing closely related individuals to be treasurer and churchwarden at the same time
- The latest statement of account and verbal report on the PCC finances should be given at every PCC meeting (minimum quarterly) with the opportunity for questions
- Where practical use Charity Commission Fraud indicators checklist

Appropriate controls in parishes so that the Treasurer is not the only person to see bank and other financial transactions

- Segregation of duties.
  - Dual control on bank accounts
  - Agreed cash handling policy – essential that 2 people involved in all cash transactions
    - If possible keep the person paying in cash separate from the person checking against the count records
  - Keep bank mandates up to date – review with PCC at least annually
    - Need multiple people to have access to bank via apps etc.
    - Multiple signatories where supported by the bank
  - Ensure bank statements are seen by multiple people (does not have to be the incumbent)
- Appropriate level of financial software
  - More than one person to have access – even if they are not active in the system
  - Appoint an admin role to have access to software and banking apps to ensure multiple access
- Regular review of purchases by PCC
- PCC awareness training (as appropriate)

Independent examiner (IE) should be known to PCC member(s) beyond the Treasurer and should normally change every 5-6 years

- An expectation should be set that the IE attends the APCM meeting at which the accounts are presented or, at least, has a discussion with the incumbent or churchwardens ahead of the APCM.
- Other Parishes in Deanery may be a good source of IE – e.g. Treasurer of one Parish does like for like for another Treasurer
- List of potential IE available at https://acie.org.uk/
- The IE should not have a personal relationship with the treasurer.
- The IE should be known to others on the PCC beyond the treasurer.
- Best practice would be for the IE to be changed at least every five years. Good governance would indicate that the appointment should be reviewed by full PCC and IE needs to be known by more than Treasurer
- Area Team to be asked to verify relationship with IE as part of inspection

Archdeacon inspections to check certain financial controls, including the discuss the above three areas

- The checklist for the inspections should be expanded to cover finances and financial governance to a far greater extent.
  - Diocese has committed to providing a new checklist to help
  - Diocese to work with area teams to ensure suitable level of knowledge for checklist compliance
- Questions relating to potential fraud indicators should be incorporated with further investigation carried out when red flags are identified.
  - Increase of interaction between area teams and central finance team to ensure any potential issues are identified early and followed up
  - Must remain practical for the skill set and time allowed for inspections
- Inspections are not guaranteed to detect fraud (even audits do not guarantee this) but are helpful to watch out for any indicators
- Review of smaller Parishes and examination of a Benefice formation and reporting at Benefice level to reduce administrative demands on individual Parishes

Diocese to strengthen, within its resource constraints, monitoring of parish accounts and the provision of resources (which may be by signposting) for PCCs and treasurers on PCC finance and controls, including Charity Commission advice

- Education of PCCs - it is a requirement to submit full accounts (Trustee report, IE report and accounts) within 28 days of APCM
- If a treasurer has not submitted accounts to the Diocese, the relevant Archdeacon, incumbent and churchwardens should be informed
- Follow up with Area Teams where accounts not received for several years
- Other indicators to be monitored such as a lack of Parochial Fee returns
- Whistleblowing to be taken very seriously and protection given for those who raise issues
- Diocese Finance team take all queries and concerns very seriously and try to help in person where possible. Other resources may need to be signposted (e.g. other websites devoted to PCC training, Charity Commission etc.)

Summary of Feedback

- Reminder that PCC members are trustees of a charity
- Ensure full PCC awareness/engagement/curiosity on financial matters
- Ensure appropriate controls in place so that more than 1 person see bank statements and financial transactions
- Independent Examiner should be known to the PCC and change every 5-6 years
- Archdeacon Inspections to include a check on financial controls
- Diocese to strengthen, within its resource constraints, monitoring of parish accounts and the provision of resources for PCCs and treasurers on PCC finance and controls.



