

## Financial Management & Accounting Policy

### Financial Management

Financial management is more than just ensuring there is sufficient cash and keeping to budget.

Financial management involves:

- Setting financial objectives
- Planning and acquiring funds
- Ensuring funds are being effectively managed
- Management and financial accounting
- Formulating strategy
- Planning and controlling activities
- Decision-taking
- Optimising use of resources
- Disclosure to other interested parties external to Easton Jamia Masjid
- Disclosure to employees
- Safeguarding assets.

Clear procedures are needed to ensure that the Trustees of Easton Jamia Masjid ("the mosque") have the tools and skills to ensure effective financial management takes place. Where staff and/or volunteers are involved, the individual responsibilities should be clear to avoid confusion, inconsistency & conflicts.

The role of the Treasurer or Chair is often crucial in discussion with key funding bodies, suppliers, commissioners of services, auditors etc. However, legally the Trustees are collectively/jointly responsible for ensuring that the mosque's resources are properly managed and accounted for and must not assume the Treasurer and/or Chair will do everything. The following policies and procedures enable the Trustees to delegate financial management to the Treasurer.

Definitions:

**Board:** The Board is the Board of Trustees of Easton Jamia Masjid.

**Financial Year:** The mosque's financial year is 1 September to 31 August.

**Treasurer:** The Treasurer is the member of the Board who leads the strategic and operational responsibility for the financial management of the mosque.

**Finance Officer:** The Finance Officer is the person who has the day-to-day responsibility for the administration of the mosque's financial transactions.

Dated: 13/12/18

Approved by Trustee board

Note: It may be the case from time-to-time that the Treasurer and the Finance Officer are the same person. For that reason, these policies and procedures are constructed in a way which does not require or imply that one role acts as a monitor/validator of the other.

Authorised Person: Authorised persons are those persons authorised by the Board of Trustees to approve financial instruments (cheques, purchase orders, invoices, etc) on its behalf.

## Income Policy & Procedures

### Purpose:

To safeguard, monitor and control income including grants, donations & contribution in the form of BACS, cheques & cash.

To outline the structure of authorisation for dealing with income, credit-control and cash management.

### When payment by cheque or cash is received:

When cheques or cash arrive the Finance Officer will ensure that cheques are properly signed and made payable to Easton Jamia Masjid and will record their arrival in the accounts; Cheques and cash received should be banked the same day where possible but at least once per week. Any cheques or cash not banked immediately must be locked away in the safe overnight or until it is banked. A maximum of £5000 cash may be held overnight.

### Cash in Transit:

All persons carrying cash to or from the bank are instructed to put their personal safety first in the event of any attempt to steal the money.

In the event of losses of cash in transit, the Treasurer must be informed immediately and take the appropriate action.

The times and days of taking cash for banking should be varied and an innocuous plain bag or briefcase must be used for carrying the money. If the amount of cash (ie: excluding cheques) being banked is greater than £500 then two people should take the cash to the bank.

### Budgeting Policy and Controls:

#### Purpose:

To provide a means of balancing projected expenditure against projected income and ensuring resources are allocated fairly;

To provide a structure for monitoring and controlling expenditure and allow authorised budget-holders the flexibility to manage their respective budgets within the limits laid down by the Board.

To ensure that funds cash flows can be effectively and efficiently managed to ensure that there are always sufficient accessible funds available to meet the mosque's financial commitments as they arise.

#### Policy:

The annual budget will provide budget-holders with the authority to spend within the amounts specified under each budget heading.

The amounts budgeted for the income and expenditure, both within budget categories and overall, of the mosque cannot be exceeded, transferred or altered without the authorisation of the Board.

The Finance Officer will provide budget-holders with regular reports (informal reports will be provided monthly as appropriate, formal reports will be provided quarterly) detailing actual expenditure against budget heading and ensure that budgets are not exceeded.

The Finance Officer will ensure that the Board (via the Treasurer, where appropriate) is informed where any breaches of this policy may occur.

#### Budget-setting Process:

A budget is a plan translated into money for a defined period of time. The time period is usually the financial year. The budget is prepared after the mosque has clarified its aims and objectives and produced a variety of action plans to achieve them.

#### The purposes of a budget are:

To co-ordinate different activities towards a single plan; To set and communicate financial targets;

To maximise and allocate resources;

To identify financial problems;

To establish a system of control by having a plan against which actual results can be compared;

To compel planning.

As the budget is a vital element of the procedure for negotiating grants and contracts, it is important that a budget is produced in good time .

The Treasurer will produce a draft budget based on previous income & expenditure patterns and the expected actual income & expenditure for the coming financial year.

The draft budget and any explanatory notes will be circulated to the Board for comment.

Any necessary revisions will be made and a final draft budget presented to the Board for approval & adoption no later than the last day in the financial year prior to that to which it applies.

## Monitoring and Revision:

The Finance Officer will monitor income and expenditure and ensure that the Board receives accurate and up to date information regarding any shortfall in projected income or increase in expenditure. Where necessary, the Treasurer will make recommendations on various options for remedial action.

Where such action may affect the level of service or staff then negotiations should be initiated with the relevant parties immediately.

## Payroll Policy and Procedure:

### Purpose:

To ensure staff are paid in accordance with their terms and conditions of employment. To ensure salary rates are competitive enough to retain staff.

To ensure statutory deductions are made and paid to the relevant authority within the time limit.

### Payment of Salaries:

All salaries are paid in arrears by cheque by the 5th of the following month, or nearest day where this falls on a Saturday, Sunday or Bank Holiday.

P45s must be handed in as soon as possible to ensure the correct tax code is applied. Where no P45 is available the member of staff will be required to sign a P46 (as are all volunteers who receive any expenses).

Where staff requires any other arrangement they must ask for consideration of the matter as soon as possible and the matter will be referred to the Board.

The final salary cheque of a person leaving employment with the mosque must be authorised by the Board.

### Deductions:

Only statutory deductions will be made without the prior written and signed authorisation from the employee.

### Overtime:

Staff will not be paid for overtime but will be expected to take time off in lieu (TOIL) equivalent to any overtime they were required to work.

### Termination of Employment:

Any outstanding debts will be deducted in full from the final net salary payment. Paid annual leave taken before it has accrued will be deducted from the gross and any accrued annual leave added to the gross. The employee should receive their P45 with their final payslip.

Dated: 13/12/18

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Timetable:

In the second week of the month the Finance Officer reconciles the previous month's salary payments to the payroll reports.

The Finance Officer must be given a written memo relating to any of the following. As much notice as possible should be given.

- New employees; Employees leaving;
- Details of sickness or maternity leave;
- Any permanent changes (in hours or pay for example); Unpaid leave arrangements;
- Any tax code changes;
- Any overtime or other agreed temporary changes.

From these the Finance Officer will calculate salaries and produce accurate payslips and deduction reports.

The Finance Officer will prepare the Inland Revenue return for the previous month and make appropriate arrangements for its payment by the due date. Whenever possible, payments will be made electronically (either by BACS or by Direct Debit) in accordance with the recommendations of HM Revenue & Customs.

Statutory Year End Annual Returns to the Inland Revenue are made, and any additional payments made, by the due date.

Purchasing Policy and Procedures:

Purpose:

To ensure that all expenditure is properly authorised and provide a standardised procedure for dealing with expenditure items.

Orders - Goods and Services:

The value of an order/purchase to be shown along with delivery charges where appropriate and both inclusive of VAT.

Budget-holders may order items within their own budget and up to £150 in value.

For purchases outside of budget or over £150 and up to £500 value the authorisation of the Treasurer is required.

Items over £500 in value must be authorised by the Board. For any purchase over £1000 in value, at least 3 quotes must be obtained in order to ensure a competitive price is paid unless the Board explicitly waives this requirement and records in the minutes of the Board meeting the justification for the waiver.

Delivery notes must be checked and initialled by the budget-holder and be filed in the delivery notes file. Any discrepancy between the order and delivery notes must be notified to the supplier immediately. In the event that a discrepancy is not rectified by the supplier as soon as is reasonably practical the Treasurer must be informed.

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Invoices must be checked against the relevant delivery notes, initialled and dated when received by the budget holder and forwarded to the Treasurer for payment.

In the event of any shortfall in delivery or the return of goods for any reason, the relevant credit-note must be received from the supplier before payment is made.

#### Purchases - Depreciable Assets:

All depreciable items over £1000 (in aggregate where the purchase is of related items) will be recorded in the accounts as a tangible fixed asset and depreciated over the appropriate period of time as defined in the Annual Report and Statement of Financial Activity.

Note: this section will not apply to charities which use Receipts & Payments accounting procedures, in which case it should be deleted in its entirety.

Payments by Cheque and Other Instruments (eg: On-Line BACS, Direct Debit):

Where appropriate, authorised persons who are not Trustees may be established by resolution of the Board. The resolution must state the reason for the authorisation and the date on which it will expire.

Where a cheque or any other form of payment is being made to an authorised person that person may not be a signatory on the cheque or other instruction for payment; The Charity Commission guidelines recommend that all cheques and other instructions to the bank, including instructions made on-line (eg: for BACS payments) be signed by two authorised persons. However, where this is not practical for small payments, the Trustees may decide to allow of amounts of up to £250 to be approved by just one authorised person, provided that that decision, and the justification for it, are clearly recorded in the minutes of the meeting at which the decision was made;

Where a cheque or other instructions to the bank – including instructions made on-line (eg: for BACS payments) – is for an amount exceeding £1000 the payment must be authorised by the Board of Trustees unless the purpose for which the payment is being made has already been approved by the Board. The authorisation of the payment can be made by written resolution, including by e-mail where appropriate (ie: the authorisation does NOT necessarily require the convening of a Board meeting).

#### On-Line Purchases Using Credit/Debit Cards:

This section should be deleted/modified if the charity's bank does provide a debit/credit card:

It is recognised that the increasing availability of on-line purchasing means that it is very often possible to secure products at very competitive prices.

The mosque's bankers do not provide a credit/debit card to allow such purchases to be on- line with direct charging to the mosque's bank account. This means that the mosque can only take advantage of competitive on-line pricing where budget-holders are willing

and able to make such purchases using their own personal credit/debit card and reclaim the expenditure from the mosque. The mosque accepts that, provided that due care is taken to ensure probity, that this is a reasonable and beneficial way of proceeding.

All such on-line purchases must have the prior approval of a Trustee who is not otherwise involved in the purchase, in addition to the budgetary approvals specified earlier.

On-line purchases of items for the mosque must NOT include within the same order any item for the personal use of the person placing the order.

Whenever possible, the delivery address for such on-line purchases should be the mosque rather than the purchaser's billing address (usually their home address).

The procedures for handling delivery notes, credit notes and invoices for purchases charged to a personal credit/debit account shall be the same as those for purchases made directly by the mosque. The reimbursement of individuals for purchases made on behalf of the mosque will always be by cheque signed by two Trustees who are not otherwise involved in the purchase (including reimbursement which are within the single-signature limit in the mosque's bank account mandate).

#### Petty Cash Policy and Procedure:

##### Purpose:

To ensure all cash is properly handled including storage, payments and record keeping. To establish accountability for the proper handling of cash.

##### Policy:

The mosque will avoid the maintenance of Petty Cash accounts except where absolutely necessary for practical operational reasons.

All cash must be kept in the Petty Cash boxes provided which should be kept in a secure place.

A signed Expenditure Voucher and point-of-sale receipt must support all transactions.

All petty cash boxes must be reconciled monthly by the petty cash holder, or named responsible person.

Requests for replacement cash must tally with the sum of the vouchers.

The Treasurer shall operate random checks on Petty Cash boxes to ensure that entries are accurate, vouchers and receipts properly stored and that the running balances are correct.

##### Administration and Accounting:

Payments from Petty Cash are recorded and signed for using Expenditure Vouchers as they are paid out.

Petty Cash and Expenditure Vouchers should always equal the amount of the agreed. Any discrepancies must be reported to the Treasurer immediately for investigation and action.

The amount of float held in a Petty Cash box will be clearly marked on the inside of the box and should be appropriate to the level of transactions passing through the box (subject to a maximum of £100).

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At the end of the month the Finance Officer will enter the petty cash expenditure into the main accounts.

#### Reporting Losses or concerns:

All significant losses should be reported to the board of trustees in writing. The trustees will consider whether recovery action should be taken, if legal advice is required, of whether a report to the charity commission needs to be made. The trustees should consider reporting significant losses, even if they are from civil disputes.

#### Money Laundering:

##### Purpose:

The mosque and its staff are committed to the highest standards of anti-money laundering (AML), including anti-fraud, anti-corruption and taking measures to mitigate against financial crime. We abide by and adheres to all applicable laws and regulations regarding AML in all jurisdictions where it conducts its business. We have developed and implemented a comprehensive set of measures to identify, manage and control all AML risks. We understand that the money laundering regulations and legislation place a responsibility upon the mosque's employees to combat money laundering with regard to a wide area of financial transactions, including possessing, or in any way dealing with, or concealing, the proceeds of any crime.

This purpose of this policy is to ensure that the mosque complies with the obligations and requirements set out by UK legislation, regulations and rules regarding AML. This includes ensuring that we have adequate systems and controls in place to mitigate against any risk posed to the firm and its clients. This policy is also in place to ensure that all employees know and understand their obligations with regards to our anti-money laundering measures and the consequences of non-compliance in this area. The mosque will do everything possible to protect its staff and clients from being exposed to money laundering and will comply with the guidance and rules laid out in Money Laundering Regulations 2007, The Proceeds of Crime Act 2002 and the Terrorism Act 2000 (as amended). Any actual or suspected acts of money laundering will be reported to the NCA and where applicable to regulatory requirements, an MLRO will be appointed to oversee all aspects of the anti- money laundering functions.

##### Scope:

The policy relates to all staff (meaning permanent, fixed term, and temporary staff, any third- party representatives or sub-contractors, agency workers, volunteers, interns and agents engaged with the mosque in the UK or overseas) within the organisation and has been created to ensure that staff deal with the area that this policy relates to in accordance with legal, regulatory, contractual and business expectations and



requirements. Failure of any staff member to adhere to the guidance and objectives laid out in this policy, may lead to disciplinary action.

Money laundering is the term used to describe the process or act of disguising or hiding the original ownership of money that has been obtained through criminal acts such as terrorism, corruption, or fraud. Such monies are then moved through legitimate businesses and sources to make it appear 'clean'.

The mosque operates under and complies with the below laws, Acts and regulations (as amended) with regards to our Anti-Money Laundering policy and procedures:

- The Proceeds of Crime Act 2002 (POCA)
- Serious Organised Crime and Police Act 2005 (SOCPA)
- The Terrorism Act 2000, as amended by the:
- The Anti-Terrorism, Crime & Security Act 2001
- Terrorism Act (Amendment) Regulations 2007
- The Terrorism Act 2006
- The Bribery Act 2010
- The Money Laundering Regulations
- The FCA Handbook
- The Joint Money Laundering Steering Group (JMLSG)

Objectives:

To prevent financial crime and money laundering within our organisation, the mosque aims to meet the below objectives:

- The reporting and detection of suspected money laundering to the NCA via a SAR
- All staff are trained and must remain vigilant for the signs of money laundering
- No payment of cash will be accepted by an individual if it exceeds £2,000 without written approval of the trustees. This will only ever be in exceptional circumstances and the source of funds must be ascertained clearly.
- Frequent risk assessment and audits of all AML and terrorist financing controls and systems
- To appoint a Money Laundering Reporting Officer with sufficient knowledge and seniority as to complete the tasks and objectives laid out in this document
- Implement procedures to enable the reporting of suspicions of money laundering
- Maintain record keeping procedures
- Utilise an employee screening program to ensure due diligence

Anti-Bribery & Anti-Corruption:

The mosque operates a zero-tolerance policy with regards to bribery and corruption, we realise that impact that bribery and corruption have on the money laundering requirements. As bribery and corruption are often associated with organised crime and/or money laundering, we are committed to applying high standards of honesty and integrity throughout our organisation and ensure that all staff operate in accordance with the intent.

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## Monitoring & Auditing Due Diligence:

The Compliance Officer is responsible for ensuring that due diligence checks, and anti-money laundering measures are being completed and are fit for purpose. Regular monthly audits are completed on due diligence forms, company checks to ensure that staff are carrying out the due diligence and AML processes in accordance with this policy and legal requirements

Procedures:

The Mosque receives donations via four different channels:

- (1) After Jumma prayers or on religious occasions volunteers will collect donations by passing a bucket amongst the congregation themselves who then count, complete the designated form and deposit the funds in the bank. This will be supervised by the trustees and all counting and form filling will be by the trustees. The trustees will be suitably vetted.
- (2) Donations which are placed in the Collection boxes located in the designated area. These boxes are opened in the presence of a group of trustees and volunteers and the funds are counted and the forms completed by the Trustees under supervision.
- (3) Donations which are made by individuals entering the masjid and handing cash sums or cheques to the Trustees. A receipt must be given, and if required due diligence carried out. The Receipt books are stored in the office and will be available for inspection by the trustees and auditors.
- (4) Fees, a fee receipt book will be maintained and receipt must be issued by teacher this receipt book and fee will be collected regularly by trustees abs handed for banking to treasurer - the fee receipt once collected will be signed by trustee who is collecting and treasurer will record receipt numbers on bank paying in slip.

Jumma/Cash donation accounting and banking:

All payments will be processed Friday to Friday weekly and will be written on paying in book and receipts issued during the week will be tallied and accounted for on a paying in slip with clear reference made to receipt numbers. This banking slip will be banked and kept safe for accounting purposes. Receipts that have had their cash or cheque accounted for will be signed on the rear as paid to treasurer with date and name of person handing the payment over.

Once the donations are logged and banked the Trustees will allocate the funds in accordance with the intention of the donor.

Donations given to help meet the running costs of the Mosque will be banked in a separate account donations that might have been given for a specific purpose such as Sadaqa, Zakat; Fitrana, will be allocated to the appropriate account and are intended to be distributed amongst the poor.

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All cheques must be issued by two signatories. No cheque can be issued by 1 trustee alone. The expenditure has to be approved by the Board of Trustees beforehand, or any committee appointed by them for this purpose.

As a charitable institution the mosque relies on donations collected from the congregation. Large amounts can be collected, and it is not feasible or possible to take identification of everyone donating sums. Most will donate very small amounts in cash, others £20 or £50 or £100 even.

However, when collecting funds all personnel should be vigilant for money laundering and look for any unusual behaviour, patterns or large donations from any individual. Most mosque users will be known to the staff, but if there is something unusual, for example a large amount being donated, then identification may be requested from the donor, as well as the source of funds ascertained.

Donations which are made by individuals entering the masjid, often involve people wanting to give from their savings. If this is more than £1,000 in cash identification must be taken and source of funds ascertained. For sums under this amount identification may be requested if the personnel involved think there is anything unusual and source of funds should also be ascertained.

Proof of who an individual or business is will be gained and recorded on a donation form. Suitable checks will also be done with suppliers or any persons transacting with the mosque.

For transactions over EUR15,000 1 form of ID is required with the person/business name on and 1 form of ID with the trading/home address. Acceptable forms of ID can include:

- Individual – Drivers Licence, Passport, Bank Statement, Utility Bill
- Business – Director/Proprietor ID, Certificate of Incorporation, Company Registration Number & Registered Office, Utility Bill, Supplier Invoice, Bank Statement

Measures to Prevent Money Laundering:

There are certain measures and controls that can be implemented and carried out to help prevent against money laundering. The mosque carries out such measures in the course of its daily business activities and is committed to preventing any aspect of financial crime:

- Donor Identification Procedures – as set out above, ID and due diligence is performed on specified transactions.
- Traceable Transactions – all transactions carried out by the mosque are recorded in such a manner that their original origin can be traced should the need arise.
- Records Management – all documents, accounts and transactions associated with clients/customers will be retained as per the legal or statutory retention periods, which currently stands at 'Close of Account +5 Years'.
- Reporting – Where required, an MLRO will be appointed and is responsible for monitoring all anti-money laundering measures and raising SAR's when needed. All documents relating to money laundering reporting, business transactions, client

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identification and customer due diligence are retained for a minimum of 5 years. We will ensure that the below minimums are met with regards to the information disclosed on any reports:

- Full details of the people involved
- Full details of the nature of their/your involvement
- The types of money laundering activity involved
- The dates of such activities
- Whether the transactions have happened, are ongoing or are imminent
- Where they took place
- How they were undertaken
- The approx./exact amount of money/assets involved;
- What has given rise to the suspicion
- Using all of the information available at the time, the MLRO to make an informed decision using sound judgment as to whether there are reasonable grounds for knowledge or suspicion of money laundering and to enable them to prepare their report for the National Crime Agency (NCA), where appropriate.

#### Ongoing Due Diligence:

Even if there is a repeat donor, or other entity/ person who continually transacts with the mosque, continuing consideration must be given to whether renewed or additional checks are required. If any doubt raise it with the MLRO.

#### Training:

The mosque has implemented a comprehensive Anti-Money Laundering and Financial Crime training program to ensure that all staff, in particular individuals responsible for transaction processing and/or initiating and/or establishing business relationships, undergo AML knowledge, competency and awareness training. Our training methods and sessions are tailored to the business to ensure that staff are aware of the different possible patterns and techniques of money laundering that could occur in their everyday duties and roles. business.

#### Responsibilities:

The mosque will appoint an MLRO where regulatory or legally required and will comply with all UK legislation and regulations regarding the prevention and mitigation of money laundering.

The mosque will ensure that all staff are provided with the time, resources and support to learn, understand and implement processes and actions to prevent money laundering and will be expected to be vigilant at all times with respect to any acts of suspected financial crime. Any suspicions re to be reported to the Compliance Officer immediately.

The Compliance Officer will ensure that any actual or suspected case of money laundering is detailed on a Suspicious Activity Report (SAR) and is reported to the National Crime Agency (NCA) with immediate effect.

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Approved by Trustee board

## MONEY LAUNDERING REPORTING OFFICER (MLRO):

The nominated Reporting Officer is Abdul Malik.

## DONATIONS GIVEN FOR A SPECIFIC PURPOSE

There are donations which might have been given for a specific purpose such as Sadaqa, Zakat, Fitrana. These will be allocated to the our bank account and are intended to be distributed amongst the poor. It is not allowed under Islamic law to expend any part of the this fund towards the running costs of the Mosque. It has to be distributed to the poor or organisations in need of financial assistance. Hence a record must be kept of the amounts.

Care must be taken to ensure that the money is only distributed to those deserving of help and that there is no risk of financial exploitation and abuse. The Applicants for the Zakat, Fitrana or Sadqa will need to make contact and send a written request or apply in person in the mosque office.

All requests have to be in writing and a Committee of three people (to be selected for their knowledge of Islamic law and adherence to religious principles) will consider the application and select the person or organisation who should receive the financial assistance. Once the application has been approved, this will be communicated to the trustees who will have to sign a form authorising the distribution of the funds to whichever worthy cause or individual has been selected.

## The Accounting and Audit Procedure:

### Purpose:

To ensure that the mosque meets the statutory accounting requirements of the Charities Commission and Companies House  
To provide accurate and useful data for the Board and staff.

### Procedure:

The mosque's accounts will be managed manually or by using appropriate software approved by the board.

The Board and the mosque's Auditor/Examiner;

The Board of Trustees appoints the Auditor/Examiner at the AGM, or at other times when circumstances require;

The Treasurer, in conjunction with the Finance Officer where appropriate, will ensure that all financial records, supporting documentation and reconciliations are accurately maintained, up to date and easily retrievable for analysis and examination purposes;

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The Treasurer will prepare timely and accurate year-end accounts in the appropriate format with the required supporting working papers and relevant reconciliations.

The Treasurer will meet with the Auditor/Examiner to ensure that audit/examination queries are resolved and that accounts are completed and signed within six months of the year end.

The Treasurer will ensure that the audited/examined accounts are filed with: the Charity Commission within 10 months of the year-end.

Easton Jamia Masjid CIO  
Board of Trustees

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