



## Holding, moving and receiving funds safely in the UK and internationally

# Checklists of some key controls when making physical cash transfers

### General issues

- are the trustees able to demonstrate that there are sound reasons for any decisions to make cash transfers or payments?
- have the trustees formally authorised its staff or agents to carry cash?
- has there been a proper assessment of risks to personal safety?
- have the trustees established adequate levels of financial controls? (see below)
- have the trustees considered the risks in using cash couriers for moving funds?
- **FATFs Interpretative Note** and **Best Practices Paper** sets out the significant risks in using cash couriers for moving funds
- have the requirements of **HMRC** been met in relation to declaration of cash when leaving or entering the UK (currently above a threshold of 10,000 euros)?

### Financial controls

Financial controls in respect of physical cash transfers could include:

- where significant amounts of cash are being transferred, trustees need to ensure that full records are kept of their decision to allow this, making clear why it is in the interest of the charity to do so and what steps will be taken to ensure the money is safely transferred and reaches its destination
- records must be kept of how much cash is being taken - and in which currency - and a detailed breakdown of what it is intended to be used for
- the breakdown should be prepared by someone independent ie not the person or persons actually carrying the cash
- any currency and commission charges should be fully documented
- the cash should be signed for by the person or persons actually carrying the cash
- on arrival the cash should be stored in a safe if possible
- there should be a proportionate policy on what should be done with any spare (unused) cash, to include circumstances where particular currencies cannot be taken out of the country

- on return a detailed breakdown of expenditure should be provided with receipts as far as possible, accompanied by a self-declaration of how funds were expended by the person responsible for taking the cash, or more than one such declaration if more than one person is travelling
- consideration should be given to the provision of emergency funds for the travellers
- where cash couriers are used, as opposed to charity volunteers or staff, the above controls should be used where relevant, although trustees need to consider whether additional controls and precautions should be introduced