

FINANCIAL CONTROLS & EXPENSES POLICY

Responsible Spending. Clear Records. Real Accountability.

Right First Time UK Ltd | Company No. 17493370 | Version 1.1 | Updated 12 October 2026 | Review at least annually

At a glance. Company funds must be separate from private money. Significant spending needs authority and evidence. Restricted income remains restricted. Genuine volunteer costs may be reimbursed, but voluntary time is not paid. Conflicts need independent checks.

1. Purpose, scope and status

This policy explains how **Right First Time UK Ltd** (RFTUK), company number **17493370**, authorises spending, handles income, reimburses expenses, records transactions and guards against fraud, conflicts and improper private benefit. RFTUK is a non-profit company limited by guarantee, not a registered charity or community interest company.

It applies to Directors, statutory company Members, Campaign Leaders, Campaigners, genuine Volunteers, employees, contractors and others entrusted with organisational money or financial decisions. Public Members, subscribers and donors do not gain spending authority merely through their support.

2. The core rules

Organisational funds must be distinguished from personal money. Expenditure must serve an authorised organisational purpose, be proportionate, supported by evidence and recorded accurately. Restricted funds must stay restricted. Significant or unusual payments require stronger scrutiny.

No individual should improperly benefit from their position, conceal an interest or approve their own remuneration, claims or connected-party arrangements. RFTUK will use controls appropriate to its size while it develops its banking, staffing and accounting arrangements.

3. Board responsibilities and financial authority

Directors retain collective responsibility for the company's accounting records, assets, relevant filings, financial risks and compliance even if bookkeeping or payment administration is delegated. All decision-makers must follow the Articles of Association and applicable law.

RFTUK should maintain a separate **Financial Authority Schedule** setting approval and payment-release limits, campaign budgets, emergency spending routes, contract authority, expense approvals and higher-risk transactions. This policy does not itself give a Campaign Leader or any other role an unlimited spending power. Where a limit is not approved or documented, obtain explicit approval before committing funds.

4. Independent checks and conflicts

Where practicable, the same person should not request, authorise, pay and reconcile a significant or unusual transaction without an independent check. Two-person approval is the preferred safeguard for higher-risk, large or connected-party transactions where systems and available personnel permit.

Directors and others must disclose relevant interests involving relatives, partners, employers, businesses or other connected people. Any connected supplier or payment must be assessed on reasonable terms and approved by an appropriately authorised, unconflicted person; the interested person must not improperly determine their own benefit.

5. Banking and payment accounts

Company receipts and payments should pass through authorised accounts and payment services in RFTUK's legal name, with clear ownership, recovery arrangements, appropriate multi-factor authentication and role-based access. Company funds must not routinely be put into a personal bank account.

Where banking arrangements are still being established, RFTUK must not describe an account as a company account unless it actually is one. Any exceptional temporary arrangement must be lawful, specifically authorised, separately recorded and reconciled, with company and personal transactions clearly distinguished and moved to appropriate accounts as soon as practicable.

6. Income, donations and PCS

RFTUK must record membership fees, donations, grants, sponsorship, fundraising, service income and other receipts separately as appropriate, with dates, amounts, providers, fees, refunds, restrictions and relevant reference details. Anonymous or unusually large donations may require proportionate due diligence.

The **Parent Contribution Service (PCS)** is operated by RFTUK Ltd, not a separate legal person. PCS service-access fees are RFTUK service income, not donations or child-contribution money. Under its stated parent-to-parent model, RFTUK/PCS does **not** receive, hold or transfer parents' child contributions. Records must distinguish membership/service charges from any payments parents make directly to each other.

7. Restricted funds and campaign budgets

Money accepted for an express purpose must be recorded and tracked so the company can demonstrate that it has been used in line with the relevant restriction. It may not be moved into general costs because another need is urgent. If a restricted project cannot proceed, the terms must be reviewed and donor consent, return of funds or another lawful outcome considered.

Unrestricted income may support lawful organisational purposes and operating costs. A campaign budget remains company money, subject to approval limits and donor restrictions. Campaign Leaders cannot enlarge their own budgets, redirect restricted funding or make unapproved connected payments.

8. Purchases, contracts and value for money

Before significant spending, record what is needed, why, the estimated price, funding source and appropriate approver. Seek approval **before** incurring the commitment except in a properly justified emergency. Retrospective approvals are exceptions, not a way to avoid financial controls.

For substantial purchases, compare reasonable supplier options where practical and document any single-supplier justification. Assess recurring contracts for affordability, renewals, cancellation terms, privacy, security, service quality and liability; review unused subscriptions and duplicate services regularly.

9. Payments and verification

Before releasing funds, check that the payee, amount, purpose, approval, budget, source of funds, declared conflicts and supporting documentation are appropriate. Verify significant supplier bank-detail changes through an independent trusted channel to reduce invoice fraud.

Banking access and payment cards should be assigned only to authorised people. Statements and platform transactions should be reconciled to records, receipts and approvals. Shared logins should be avoided where individual credentials are available.

10. Cash and physical collections

Cash collections should be minimised and only undertaken with necessary permissions. Record the date, source and amount, use two-person counting or another independent check for significant takings where practical, and deposit promptly into an authorised company account.

Organisational cash should not be retained indefinitely in personal possession. Volunteers must not collect company money into personal accounts except under a genuinely exceptional, lawful and documented arrangement approved in advance.

11. Genuine volunteer expenses

Genuine Volunteers are not paid for their voluntary time. RFTUK may reimburse reasonable expenses actually incurred for authorised work, such as public transport, mileage, parking, printing, postage, necessary meals, approved accommodation or accessibility-related costs. A role title alone does not create entitlement to payment.

Reimbursement must reflect evidenced out-of-pocket costs, not a flat reward or disguised wage. Repeated allowances, rewards or arrangements resembling paid work must be checked for employment, National Minimum Wage and tax implications. Campaign Leaders and Campaigners acting as Volunteers follow these same rules.

12. Director, employee and contractor payments

During the stated initial voluntary stage, the Founder and Directors do not receive salary merely for carrying out their voluntary roles; genuine approved expenses may be reimbursed. The company may create genuine paid positions later only when lawful under its Articles, formally authorised, affordable, reasonably remunerated, documented and compliant with conflict and tax requirements.

A Director must not improperly approve their own pay or expenses. Employee and contractor payments require appropriate contracts, invoices or payroll records and the correct treatment of PAYE, National Insurance, pensions, employment status and VAT where applicable. Do not use a Volunteer or contractor label to evade rights and duties arising from the real arrangement.

13. Claiming expenses and receipts

Claims should identify the claimant, activity, date, amount, category, relevant campaign and business purpose, supported normally by a receipt, invoice, booking record, mileage log or other suitable evidence. Claims should be made promptly. If a receipt is unavailable, provide an explanation and alternative evidence for review.

An authorised unconflicted person should review claims. Claims may be reduced or refused where excessive, personal, undocumented, outside authority or unrelated to RFTUK. Repeated missing evidence or vague descriptions require scrutiny; a Director's own claim should, where feasible, be checked by somebody else.

14. Mileage, travel and accessibility

Private-vehicle claims should show the date, purpose, route and mileage. RFTUK may use current HMRC-approved mileage rates or another lawful approved basis rather than fixing a rate permanently in this policy. Drivers must maintain any required licence, insurance and permissions.

Travel and accommodation should balance reasonable cost, purpose, accessibility and safety. More expensive or overnight arrangements normally need advance approval. People should not be forced into an unsuitable option solely because it is cheapest when genuine access needs justify another reasonable choice. Personal leisure, luxury upgrades and alcohol are not ordinary reimbursable expenses.

15. Advances, hardship and payment cards

Where asking a Volunteer or representative to pay up front would cause hardship or an accessibility barrier, RFTUK may pay the supplier directly or authorise a documented advance. Advances must be reconciled against real expenditure and unused sums returned promptly.

Payment cards must be restricted to authorised activity and protected against misuse. Accidental personal charges must be reported, repaid and recorded; deliberate personal spending is not permitted.

16. Fraud, gifts and political spending

No company funds may be diverted to fabricated expenses, undisclosed private purchases, improper gifts, bribes or payments designed to buy influence. Significant hospitality and connected gifts require disclosure and review. Grants to other charities or community projects require a lawful organisational purpose and suitable oversight.

RFTUK's stated non-party political independence means company funds are not used to endorse or finance a political party or candidate. Lawful issue campaigning and lobbying may be funded within RFTUK's objects and electoral rules; potentially regulated election spending requires separate assessment and records.

17. Speaking up, incidents and investigations

Suspected theft, fraud, bribery, false invoices, misuse of restricted money, concealment or unauthorised transfers should be reported promptly through an unconflicted channel. RFTUK should preserve evidence, protect funds, investigate fairly and seek advice or contact banks, police or regulators where justified.

People raising genuine concerns in good faith must not suffer retaliation. Protective measures, such as pausing access or payments, do not by themselves establish misconduct. Questions or complaints can be raised via RFTUK Contact Us or complaints@rightfirsttimeuk.com.

18. Reconciliation and accounting records

Bank statements, cash, platform statements, invoices and the company ledger should be reconciled regularly. Differences, fees, chargebacks, refunds and duplicate payments must be investigated. Historic corrections should retain an audit trail rather than erase evidence of an earlier error.

Keep records sufficient to show and explain the company's transactions and financial position, including income, spending, assets, liabilities, payroll, contracts and restricted funds. RFTUK adopts a **six-year internal retention baseline** for core accounting and Corporation Tax records, with longer periods where required by law, tax enquiries, grant conditions, litigation or other justified needs.

19. Budgets, cash flow, reserves and assets

Directors should monitor budgets, operating costs, commitments and cash flow and respond promptly to material overspending or shortfalls. Budget approval does not replace individual spending authorisation. Reserves are held for company purposes, not distribution as private profit; creditor interests must be considered when insolvency risks arise.

Keep proportionate records of significant company equipment and assets. Company property must be protected, returned when required and disposed of appropriately; connected-party disposals need independent approval and reasonable terms.

20. Public transparency and statutory reporting

RFTUK should provide meaningful information about significant income and expenditure, including donations, membership, grants, campaign spending, technology, expenses and remuneration where relevant. Reports may be periodic and must not reveal private bank details, donor identities, confidential payroll, safeguarding or security information without a lawful basis.

The company must meet Companies House filing, accounting and applicable tax obligations. Non-profit status does not automatically remove Corporation Tax, VAT, PAYE or other duties. VAT must not be charged, reclaimed or described as exempt without a valid basis. Public reports supplement, but never replace, statutory accounts and tax records.

21. Confidentiality, security and departure

Financial records may contain sensitive personal and commercial information. Limit access by role, secure records and backups, use strong authentication and follow RFTUK's Data Protection & GDPR and Information Security policies.

When access is no longer authorised, promptly revoke online-banking rights, payment cards, access tokens and accounting permissions, and recover company property, outstanding advances and records. Former role-holders must not keep confidential donor or financial records without authority.

22. Governance, review and related policies

This policy should be read with RFTUK's Articles of Association, Donation Transparency, Fundraising, Conflict of Interest, Volunteer, Campaign Leader & Campaigner, Complaints, Data Protection and Political Independence policies. The Financial Authority Schedule is a separate operational document and should be updated whenever authority or banking arrangements change.

RFTUK will review this policy at least annually and sooner when banking, tax, fundraising, staffing, technology, law or material financial risks change. **Updated: 12 October 2026; version 1.1.**