



DIOCESE OF OSSORY

FINANCIAL PROCEDURES

**FINANCIAL CONTROLS AND RELATED PROCESSES
WITHIN PARISHES**

Revised and adopted by Diocese of Ossory
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EXECUTIVE SUMMARY

The President of Ireland signed the Charities Act 2009 into law on Saturday, February 28th 2009. Some of the provisions of the 2009 Act came into effect on 16th October 2014 with the Diocese of Ossory becoming a Registered Charity. Since then sections of the 2009 Act have been commenced in a phased manner by the Government. Across the country, therefore, this Act has brought about far reaching changes for charities, their governance, financial control and reporting. Under the Act the audited financial statements of the Diocese (combining all parishes) will be published annually. Therefore the Diocese needs to ensure that steps are being taken to assure compliance with the relevant Acts.

In November 2018 the Charities Regulator published a Governance Code which explains the minimum standards a charity should meet to manage effectively and control its financial affairs. 2019 will be a year of learning and preparation, 2020 will be the first year that registered charities are expected to comply with the Code. 2021 will be the first year that registered charities are expected to report on their compliance with the Code.

The Catholic Church in Ireland has implemented procedures on financial controls within dioceses and parishes. These procedures are designed to bring about important improvements in the overall Church governance in this area.

The procedures are not a challenge to the undoubted integrity and trust of clergy and those involved in supporting parish activities, but they are intended, through the identification of responsibilities, transparency and accountability, to provide adequate protection against potential fraud and negligence. Neither are they intended to undermine the juridical status of the Parish Priest in the Code of Canon Law.

The core principles on which these procedures have been formulated are based on Canon law, good business practice, statements of recommended practice for charities and results in sound financial principles and processes, accountability and transparency. The procedures encourage parish clergy, whilst retaining overall and ultimate responsibility for finances, to involve and work closely with Parish Finance Committees and parishioners in the overall effective management of finances and related financial controls within the parish.

In summary the key guiding principles include:

- A Parish Finance Committee comprising both clergy and lay people;
- Appropriately resourced Parish Officer — either paid or voluntary;
- Robust control over income including involvement of at least two people in money collection, counting and banking of all parish income;
- Robust control over all payments;
- Retention of all books and records in a systematic manner;
- Preparation and maintenance of a comprehensive listing of all fixed assets (inventory) of all parish land, property and equipment;
- All bank accounts in the name of the parish;
- Preparation of an annual budget;
- Regular reporting of parish income and expenditure to the Parish Finance Committee,

- Annual audit of parish accounts;
- Regular reporting to the diocese, preparation of annual accounts and completion of diocesan returns and annual reports to parishioners;
- Introduction of simplified and standardised diocesan reporting systems and formats, resulting in uniform recording of financial information on a parish level;
- Notification to the diocese of material bequests, wills, legacy's and major donations;
- Training on financial matters for deacons, priests and members of the Parish Finance Committees;
- An independent review of parish finances on the changeover of Parish Priests;
- Introduction, at the discretion of the Bishop, of random audits of parishes — not only in cases where financial mismanagement or fraud is suspected, but covering all parishes once in every 6-9 years;
- Introduction of a serious complaints/concerns process & whistleblowing charter.

Implementation of these key changes represents a significant change in the management of parish finances. They have brought Church financial controls broadly into line with generally accepted standards of control and governance within many charities and the private sector. The implementation of the Charities Act 2009 demands stricter degrees of accountability and transparency.

While some parishes may not have a Parish Office, all will have a room where financial activity takes place and records are kept.

PROCEDURES

The key aspects of the procedures are given below.

1.1 Mandatory Finance Committee

Each parish, in accordance with canon law (c.537), must have a Parish Finance Committee, which will assist and advise the Parish Priest in all areas pertaining to financial management and administration of parish property and goods. The Parish Finance Committee has sole authority for management of parish finance. Members should be fully appraised of and have full control of the financial situation in the parish. Its role is consultative, in accordance with c. 532. It is separate from the Parish Pastoral Council, (c.536) and, subject to the PP's approval, has full oversight of parish finances.

The Parish Finance committee is distinct from any exclusively fundraising committee, though it will work closely with any such committee, even by appointing a member on to that committee to ensure the proper execution of the agreed fundraising policy for the parish.

Parish Finance Committees should have structured meetings with agenda and minutes, make plans, and advise the Parish Priest in making decisions. The Parish Finance Committee should deal with issues such as planning, financial accountability including reviewing practice and procedures and viewing the quarterly income and expenditure of the parish and organising

consolidated returns for the diocese. The Parish Finance Committee will check the finances of the parish, give advice and produce a consolidated annual budget and returns for the parish.

1.2 Finance Committee Membership

The membership of Parish Finance Committee should be:

- Parish Priest and clergy; who are ex officio members.
- Lay members from each parish area, at least two to be male and two to be female;
- Normally the Chairperson should be a lay person, preferably with experience in financial and business matters; See 6a ¹'The PP or his delegate is to be chair'
- One member should act as Secretary;
- A quorum for meetings of the Parish Finance Committee is to be one half of the members and the Chairperson.
- The Parish Priest may delegate the curate to represent him in his absence.
- The Parish Priest, in consultation with members of the Committee, appoints the Chairperson.

The Parish Priest, in consultation with the outgoing Finance Committee, should appoint the members. The method used for recruitment should be made known, in advance, to the people of the parish. See 7a². "The PP, with other priests and with suitable lay advisors will appoint PFC."

The Chairperson of the Pastoral Council should be invited to attend some meetings of the Parish Finance Committee each year, particularly when the annual budget, annual accounts and Diocesan Returns are tabled and approved.

All persons, whether clerics or laity, who take part in the safeguarding and administration of ecclesiastical goods, are bound to fulfil their duties in the name of the Church, in accordance with canon law (c. 1282). Members of the Parish Finance Committee are to sign an undertaking of willingness to work on the committee and of confidentiality. All undertakings to be retained in parish office.

1.3 Tenure

- The term of office for each Parish Finance Committee will be 5 years. They may be re-appointed for a second consecutive term only. Officers may not serve in the same office for two consecutive terms.
- Rotation phased over time to ensure stability and retention of experience and skills.

¹

6a above refers to 'A Parish Pastoral Directory' ed William Dalton pg 258

²7a above refers to 'A Parish Pastoral Directory' ed William Dalton pg 258

1.4 Profile and key roles on the Parish Finance Committee

The Parish Priest acts in the person of the parish, in accordance with canon law (c.532). As such he represents the parish in all legal matters. He is responsible for the implementation of sound financial controls within the parish, supported by the Parish Finance Committee. Since the Parish Priest is the one ultimately responsible in law for the financial affairs of the parish, he or his delegate **must** be present at Parish Finance Committee meetings for such meetings to be valid.

The profile and key roles of the Parish Finance Committee are:

- The Parish Finance Committee will meet 4-5 times per year with provision for extra meetings where the need occurs.
- The Parish Finance Committee will assist the PP in compiling an up to date, comprehensive inventory of all parish property and equipment. A copy of this is to be kept in the parish archives and another lodged in the diocesan archives (cf c1283 #2 & 3). Property folio numbers and acreage of parish land should be included in this listing. See 12 below for details of information to be maintained and reported upon.
- Ensuring proper books of account are maintained and effective internal financial controls are in place, in accordance with Diocesan Financial procedures;
- Approval of appointments to paid positions of employment by the parish.
- Ensuring that all Employment law and Revenue regulations relating to persons in receipt of remuneration from the parish are adhered to;
- Preparation of the annual parish budget;
- Critical review of accounts at least quarterly including performance against budget and actual income & expenditure;
- Review all fundraising activities;
- Review of outlays on repairs and maintenance and capital spending in line with authorised limits, both local and diocesan, as directed by the Diocesan Financial Administrator or the Bishop;
- Protection and insurance of parish property in line with diocesan requirements;
- Approval of members of counting teams and others involved in parish administration;
- Approval of all projects to be undertaken by the parish;
- Retention of minutes of the Finance Committee meetings;
- Approval of the design and content of parish financial reports circulated to the parishioners, as appropriate;
- Review of diocesan returns together with the Parish Priest;
- Submitting the parish accounts to the Diocesan Financial Administrator.

2. Parish Finance and Administration

In larger parishes a suitably experienced Parish Finance Officer (voluntary or paid) should be appointed. In smaller parishes, where limited resources are available, this is likely to be part time and voluntary.

The Parish Priest, supported by the Parish Finance Committee, is responsible for ensuring that effective financial controls are in place relating to:

- Timely preparation and circulation of quarterly accounts;
- Effective and robust control over lodgements;
- Robust control over payments (including salaries);
- Preparation and maintenance of Church asset records;
- Timely preparation and submission of required diocesan returns to the Parish Finance Committee;
- Preparation and finalisation of the annual budget for the Parish Finance Committee;
- Key liaison and support to the Auditor/Diocesan Accountant in preparation and finalisation of the annual accounts.

3. Annual Parish Budget

Each parish should prepare an annual (forward) budget detailing estimated income and expenditure for the forthcoming financial year (c. 1284.par.3). This should be prepared within one month of the beginning of the new financial year, and be based on historical expenditure trends unless exceptional outlays on non recurring expenses, capital expenditure or major repairs are expected; the budget should be approved by the Parish Priest and the Parish Finance Committee.

4. Annual Audit & Auditors

- As a statutory requirement under the Charities Act 2009, each parish, as part of the combined accounts of the diocese, will be subject to an audit by an external independent registered auditor once a year. The audited accounts, along with an annual report, will be published by the Charities Regulator online for public access.
- Each Parish must keep accurate records of income and expenditure (c. 1284.par.4). All documentation received during a financial year must be retained in the parish office for inspection. The Diocesan Financial Accountant, in advance of the statutory audit, will undertake a brief review, through discussions with staff and sample transaction testing (where necessary), to ensure that the internal financial controls of the parish are operating satisfactorily. This review will be extended where there have been changes in staff.
- The Parish Finance Committee should provide support and the required information to the Diocesan Financial Accountant to complete the accounts in advance of the statutory audit and work within the established timetable and Diocesan/Auditor timeframes. Compliance with the above two points will ensure that the length of the statutory audit, and their subsequent fees, will be greatly reduced and that all reporting deadlines issued by the Charities Regulator are met.

5. External Review on change in Parish Priest

At the time of a changeover to a new Parish Priest, The Diocesan Financial Administrator may undertake a review of parish financial affairs. This will include a review of the financial books, bank accounts, and the asset records of the parish, and related control processes, and ensure that all is in order within four weeks of the new Parish Priest taking over.

The Diocesan Financial Administrator's report should be circulated to the Bishop, the outgoing and incoming Parish Priests, and the Chairperson of the Finance Committee. Any required action as a result of issues raised in the report should be handled directly by the Diocesan Finance Administrator in consultation with the Bishop as appropriate.

The Diocesan Financial Administrator or the local Bishop may, at any time, instruct that an internal audit of a particular parish, or parishes, takes place if there are concerns in relation to the adequacy of financial controls prior to the annual statutory audit.

6. Control over Income

6.1 Church Collections - Collectors

- Appointed teams (approved by the Parish Finance Committee) should take up all collections (Sunday, weekday church collections together with all special collections including those covering clergy salaries) at each mass. It is recommended that the collections be taken up at the offertory and not at the door. While there are still two or more collectors present, the collections should be placed in a pre-numbered, labelled tamper proof bag and placed securely in the church safe and the Collectors Record form completed and signed by the collectors.

Church Collections — Counters, Safes and Secured Area

- Combinations and keys for the safe should never be stored in an unlocked drawer, hung on a wall, the back of a door or in unsupervised areas where unauthorised persons can gain access to them. The safe should be in good working condition at all times and the safe door should always remain locked.
- The amount of funds secured should be kept to a minimum.
- The Finance Committee should appoint counting teams who, on a rota basis, should count the church collections each week. Those who collected the cash during the offertory should not form part of the counting team.
- There must be at least two people present during the whole process of the count, from when the safe is opened until the count is completed, whereby the count records are completed.
- The tamper proof bags are removed from the safe and checked to ensure that the bags are still intact. Any issues are to be documented and noted to the parish priest.

- The counting team will separate offerings by offering type and record them. After which the cash will be separated according to denomination and counted. A second person of the counting team will recount the cash and any discrepancies noted.
- The formal bank lodgement slip(s) should be prepared by the counting team. A record will be maintained in a separate register, indicating the date, the counting team, the amount counted and if it was received by envelope or cash and the sequential number of the lodgement slip(s). The record will be signed by the counting team.
- Any missing lodgement numbers are to be identified. Separate collections should be counted and recorded separately and lodged with a separate lodgement slip.
- Once the count has been completed the monies and documentation, including the offering envelopes, are to be placed in the safe by two of the counters;
- The room in which money is counted should never be left unattended, with at least two counters remaining with the money during the count, as any loss or theft of cash may not be covered by the related insurance policy.
- The designated person, accompanied for security purposes by at least one other independent person, if deemed necessary by Parish Finance Committee, should remove the monies from the safe on a weekly (fortnightly in smaller parishes) basis and together lodge them at the bank. All money transits to the bank should be in accordance with current limits as contained in the insurance policy. The times of transits to the bank should be varied to improve security.
- The empty envelopes and register of count are to be given to the Parish Finance Officer.
- On receipt of the bank statement the register should be agreed with the monies lodged and cross-referenced to the bank statement by the Parish Finance Officer. Any discrepancies should be identified and investigated.
- Totals of the previous week's collection should be published in weekly bulletin/newsletter.
- The cash collection process should be reviewed regularly by an appointed member of the Parish Finance Committee to ensure the above controls are adhered to.
- Receipts issued to parishioners who contributed by way of offering envelope of amounts contributed for the year should be issued shortly after the year end. Receipts to be agreed to offering envelopes for the year and a copy retained in parish office.

Church Collections — outside parishes/diocese areas

- Envelopes for other parishes should be recorded as received and returned to the home parish without any unnecessary delay.
- The Parish Priest and the Parish Finance Committee should ensure that collections which are taken for purposes outside the diocese are transmitted to the Diocesan Office as soon as possible, preferably one month, but not later than three months, after the collection has taken place.

6.2 Church Collection Boxes — books/newspapers/candles

- Two members of the counting team should empty the church collection boxes at least once a week and include in the weekly count.
- The monies so collected should be put in a tamper proof bag, as appropriate, and locked in the safe. The date of the collection, the people involved, and those responsible for depositing the money in the safe should be recorded in a register retained by the Parish Office.
- This register should be made available to the counting team who should sign and confirm that the tamper proof bags/monies have been included in the weekly count. The counting and lodgement process should then follow as in 6.1 above.

6.3 Income received through bank debits and standing orders

- Such income should be handled directly by the Parish Finance Officer. A register of direct debits and standing orders should be maintained by the Parish Office to control bank debits and standing orders. This should be compared to bank statements on a regular basis (at least quarterly) to ensure that all direct debits and standing order income has been received and the amounts entered into the accounting system.
- Receipts issued to parishioners, for contributions made (where known) for each calendar year should be issued shortly after the year end and a copy retained in parish office.

6.4 Donations and Income (bequests etc.) received by post

- The total amount of cheques received should be recorded in a receipt book. The receipt book should be cross-referenced to the Bank Statement showing the related lodgement by the Parish Finance Officer.
- A copy of the cheque should be retained in the parish offices.
- The Parish Finance Officer should prepare the lodgement slip and the lodgement process should be in line with 6.1 above. A receipt/acknowledgement should be issued in all cases and retained.

6.5 Monies received by clergy or parish office or committee members directly

- Where donations are received by the clergy or members of the parish finance committee — these should be handed directly to the Parish Finance Officer who should issue a receipt and a copy of the receipt retained. All parishes are to have an official sequentially numbered receipt book.
- Money handed into the Parish Office should be receipted in all cases.
- Monies collected under this heading should be placed in the safe as in 6.1 above for counting by the counting teams.

If there are any conditions or restrictions attached to any donation, (Will, Bequest etc) a copy of any documentation received should be retained and it should be made known to the Diocese upon submission of annual accounts.

7. Control over payments

7.1 Clergy and Staff Salary payments

The Parish Office should prepare the payroll (or it can be outsourced if necessary) and this should be approved by the Parish Priest before payment is executed. Copies of the payroll duly authorised should be retained for audit purposes.

All payments to individuals e.g. cleaners, church helpers should be paid through the PAYE & PRSI system. Employment contracts should be issued to all staff and there should be clarity about pension arrangements, if any. Access to a PRSA must be provided to all staff. In the event that payments are made to other individuals care must be exercised to ensure that such amounts are not subject to PAYE or deduction of tax at source. Clarification should be sought from Diocesan Financial Administrator, if required.

Under Employment law contracts and terms of employment should be issued to each employee along with Diocesan Policies.

Revenue returns are to be submitted per revenue requirements. All payroll records to be maintained on file for audit purposes.

As part of the selection process in recruiting parish staff references should be obtained and verified.

7.2.1 Non salary payments

- All payments should be made only when supported by the following documentation:
 - A payment request / invoice / receipt covering each payment and approved by the Parish Priest;
 - A supplier invoice or receipt; suppliers should be requested to address all invoices to the Parish Office;
 - Confirmation of delivery of goods received should be obtained by retaining the signed delivery docket.
- All payment requests should be approved by the Parish Priest.
- All cheques should have at least two designated signatories. One to be the priest of the parish.
- No cheques should be pre-signed.

Chequebooks should be kept in a secure location and access limited to approved persons only. Failure to observe these precautions may result in any insurance claim for loss or theft being refused.

7.3 Major expenditure on capital or major repairs

- The Parish Priest, in accordance with c. 1281-1288, should consult with the Bishop and the Diocesan Buildings and Properties Committee (by submitting a short written proposal outlining the expenditure and its nature) on capital expenditure or repairs above €10,000. If the initiative comes from the Pastoral Council approval of the Parish Priest and the Parish Finance Committee will be needed.
- Approval authorisation received should be retained for audit purposes.
- The parish finance committee should ensure that for any works or supplies of larger amounts there are tenders invited before deciding on the preferred supplier.

8. Petty Cash Payments

- Petty cash activity should be kept to a minimum. Petty cash payments should be restricted to amounts below €100 where cash payments are required.
- A cash float should be approved by the Finance Committee and increases in the float also approved. The cash float must be kept locked and secure when not required, in a separate petty cash box for which there is only one key, which is held by the person responsible.
- The Parish Finance Officer should manage the float and, on a weekly/fortnightly basis, a summary of expenditure should be prepared and supporting documentation retained.
- This, together with supporting documentation, should be submitted to, and approved by, the Parish Priest.
- Petty cash should not be used to pay major suppliers, contractors or employees.

9. Bank Reconciliation and Online Banking

- The Parish Finance Officer should prepare at least quarterly bank reconciliation and monthly where there are a larger number of transactions for all bank accounts. This should be copied to and reviewed at Parish Finance Committee meetings and signed and indicated as reviewed.
- In the case of online banking a limited number of persons should have access to the parish's online banking.

10. Bank Accounts

- All Parish Bank Accounts should be in the name of the parish.
- The number of parish bank accounts should be kept to a minimum.
- All parish deposit accounts in which temporary surplus funds are invested to generate interest income must also be in the name of the parish.
- The Parish Priest should, as part of the annual diocesan returns, formally certify that all bank and deposit account balances, together with all parish income, have been included in the annual accounts and diocesan returns.

11. Borrowings

- The parish should not borrow funds for day-to-day parish needs unless the Finance Committee has been fully consulted and, together with the diocese, approve the borrowing and its related terms and conditions.
- All documentation from banking institution in respect of any borrowings undertaken should be retained.
- All borrowings over €10,000. for investment in church property, including major repairs and maintenance, must be pre-approved by the diocese.

12. Assets

Every parish will prepare and maintain a Fixed Asset Register (inventory listing) indicating all properties and assets (with a value over €500) owned by the parish, or held in trust on behalf of the parish. A fixed asset register template will include the following detail:

- Property or asset description to be recorded under one of the following headings:
 - Land
 - Buildings (Residential properties, Parish halls, Churches & Presbyteries and Investment properties)
 - Furniture, equipment and fittings
 - Computer equipment
 - Heritage assets (incl Chalices, Ciboria etc)
- Date acquired
- Original value
- Location (i.e. are fixtures and fittings in church sacristy /parochial house etc.)
- Acreage and folio number (where appropriate)
- In the case of all properties, whether owned or held in trust, the location of the Deeds of Title should be indicated.
- Date of disposal / sale.

All assets should be adequately insured and insurance policy retained. A review of the insurance policy should be carried out by the finance committee at the end of year term.

The Asset Register should be maintained on a continuous basis and a physical review of the assets held versus the register should be carried out at the end of each year by the Finance Committee to ensure accuracy. Any assets that have become idle and are not used by the parish should be disposed.

13. Reporting

13.1 Parish Accounts

Parish accounts should be prepared at least quarterly. A summary of income and expenditure should be prepared and circulated to the Parish Priest and the Parish Finance Committee for review. A minute of this will be made. The summary will include the bank and deposit account balances at the end of the quarter.

13.2 Annual Accounts

Annual accounts will be prepared and externally audited on an annual basis. The accounts, once approved by the Parish Priest and Parish Finance Committee, should be forwarded to the Diocesan Office within two months of the end of the financial year. The accounting policies and standards to be used in the accounts will be mandated by the diocese so as to enable it to comply with reporting requirements under the appropriate charity legislation.

13.3 Parish Information

The Parish Finance Committee should prepare and publish widely within the parish a consolidated statement of Income and Expenditure. This should include a comparison with the outcome to the previous year and provide explanations of significant changes in either income or expenditure.

14. Insurance

The Parish Priest, in consultation with the Parish Finance Committee and under the direction of the Diocesan Insurance Broker and the Diocesan Bishop, is responsible for ensuring that Church property and assets are adequately insured.

15. Tax refund schemes

Each parish as part of the Diocese of Ossory (a registered charity with Revenue) is entitled to claim a refund in respect of donations by an individual (in excess of €250) in a tax year. Each parish should arrange for the necessary documentation (including certificates signed by donors) to be submitted to the Diocesan Office in order to avail of the refund. A report of donations made by individuals during the year should be maintained and should be agreed to offering envelopes/documentation prior to submitting the documentation.

16. Parish Fund Raising

- Decisions to implement fundraising activities, apart from normal collections and church offerings, will be made in consultation with the Parish Finance Committee.
- The Parish Priest, supported by the Parish Finance Committee, will oversee compliance with Charity Regulations.
- It is the responsibility of the Parish Priest, in association with the Parish Finance Committee, to ensure that those requirements relating to Garda authorisation, Health and Safety, and Insurance are adhered to.

- All matters relating to fundraising activities should be conducted in a completely open and transparent manner, leaving no doubt that all funds raised are directed appropriately.

Major fundraising campaigns may require pre-authorisation from the diocese.

17. Induction Training

An induction-training programme should be developed at diocesan level, for all priests and members of Finance Committees. This should cover internal financial controls and related best practice.

18. Compliance

Compliance with the financial procedures and the Charities Act 2009 will be assured through:

- Requiring the Parish Priest and Chairperson of the Parish Finance Committee to sign, as part of the Annual Accounts and Diocesan Returns, a statement confirming full compliance with the procedures and highlighting any areas of major non compliance and the related reasons and action plan to rectify this.
- The independent auditor will be required to confirm that the audit has not identified any areas of non-compliance with the Charities Act 2009 and Financial Reporting Standard. Any weaknesses identified by the statutory auditors will be communicated to the parish finance committees.
- Non-compliance will result in a modified audit opinion being provided by the external auditors which may indicate on public record that the diocese did not maintain proper books and records.
- Diocesan Bishop, or the Irish Episcopal Conference, will establish procedures and processes to be put in place where there is continued major non-compliance with these procedures.

APPENDIX 1

Training

Parishes should identify the areas of financial management in which they require training. The following areas have already been identified:

- The role of the Parish Finance Committee
- The role of the different officers of the Finance Committee
- Bank reconciliation process
- Recording financial information
- Compilation of financial records/reports
- Availing of tax refunds (Revenue)
- Forward Budgeting

APPENDIX 2

Example of Schedule of Parish Finance Committee Meetings during a Financial Year

February	Meet to finalise all accounts for previous year – send to Diocesan Financial Administrator
May	Meet to review parish accounts for Jan, Feb, March
September	Meet to review parish accounts for April, May, June
November	Meet to review parish accounts for July, August, September
December	Meet to finalise forward budget for parish