



HALL GREEN SCHOOL

FINANCIAL REGULATIONS MANUAL

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Governing Committee:	Finance and General Purposes
Responsibility:	Headteacher Chair of F&GP Committee

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1. Introduction

- 101 The purpose of this manual is to ensure that the academy maintains and develops systems of financial control which conform to the requirements both of propriety and of good financial management. It is essential that these systems operate properly to meet the requirements of our funding agreement with the Department for Education (DfE).
- 102 The academy must comply with the principles of financial control outlined in the Academies Financial Handbook published annually by the ESFA. This manual expands on that, and provides detailed information on the academy's accounting procedures and systems. The manual should be read by all staff involved with financial systems.
- 103 The trustees **must** ensure regularity and propriety in use of the trust's funds, and achieve economy, efficiency and effectiveness – the three elements of value for money. The trustees **must** also take ownership of the trust's financial sustainability and its ability to operate as a going concern.
- 104 This manual is reviewed on an annual basis.

2. Organisation

- 201 The academy has defined the responsibilities of each person involved in the administration of academy finances to avoid the duplication or omission of functions and to provide a framework of accountability for governors and staff. The financial reporting structure is illustrated below:

The Governing Body

- 202 The governing body has overall responsibility for the administration of the academy's finances. The Governing Body is made up of Members and Trustees, constituted according to the Articles of Association drawn up with the DfE when the academy was established. Members cannot be employees of the trust, or occupy staff establishment roles on an unpaid voluntary basis.
- 203 The main responsibilities of the governing body are prescribed in the Funding Agreement between the Academy and the DfE and in the academy's Articles of Association. There are six meetings in the year. The main responsibilities include:
- approving the academy's financial controls and procedures through the Financial Regulations Manual;
 - ensuring that grants from the DfE are used only for the purposes intended;
 - approval of the annual budget;
 - appointment of the Headteacher;
 - appointment of the Chief Financial Officer
 - approval of the academy's personnel establishment
 - reviewing pupil number projections on a termly basis
 - oversight of the risk register and review of the risk register at least annually.

The Finance and General Purposes Committee

- 203 The Finance Committee is a committee of the governing body. The Committee meets six times a year but more frequent meetings can be arranged if necessary.
- 204 The main responsibilities of the Finance Committee are detailed in written Terms of Reference which have been authorised by the governing body. The main responsibilities include:
- acting as the Audit Committee on behalf of the trust
 - the initial review and authorisation of the annual budget
 - the regular monitoring of actual expenditure and income against budget
 - ensuring the annual accounts are produced in accordance with the requirements of the Companies Act 2006 and the DfE guidance issued to academies
 - authorising the award of contracts and orders as stipulated by the Scheme of Delegation
 - authorising and reviewing the virement limits delegated to the Headteacher and
 - providing assurance to the Board of Trustees over the suitability of, and compliance with its financial systems and operational controls, and to ensure that risks are being adequately identified and managed
 - agreeing a programme of work to prioritise its assurance on financial controls and risks. Reports how this programme of works must also be reported to the full Governing Body and included in the annual accounts published to the ESFA
 - review the school risk register and advise the full Governing Body on risk
 - review the external auditor's plan each year
 - review the annual report and accounts
 - review the auditor's findings and actions taken by the trust's managers in response to those findings
 - assess the effectiveness and resources of the external auditor to provide a basis for decisions by the trust's members about the auditor's reappointment or dismissal or retendering. Considerations may include:
 - the auditor's sector expertise
 - their understanding of the trust and its activities
 - whether the audit process allows issues to be raised on a timely basis at the appropriate level
 - the quality of auditor comments and recommendations in relation to key areas
 - the personal authority, knowledge and integrity of the audit partners and their staff to interact effectively with, and robustly challenge, the trust's managers
 - the auditor's use of technology.
 - produce an annual report of the committee's conclusions to advise the board of trustees and members, including recommendations on the reappointment or dismissal or retendering of the external auditor, and their remuneration.

The Headteacher/Accounting Officer

205 Within the framework of the academy development plan as approved by the governing body, the Headteacher/Accounting Officer has overall executive responsibility for the academy's activities including financial activities. Much of the financial responsibility has been delegated to the Chief Financial Officer but the Headteacher still retains responsibility for:

- approving new staff appointments within the authorised establishment, except for any senior staff posts which the governing body has agreed should be approved by them
- authorising contracts and as stipulated by the Scheme of Delegation
- authorising payroll payments in conjunction with the Chief Financial Officer
- signing cheques and BACS payments in conjunction with the Chief Financial Officer or other authorised signatory
- Accounting Officers must adhere to the 'seven principles of public life'. See Appendix 1
- Completing the School resource management self-assessment tool and submitting the completed checklist to ESFA by the specified annual deadline.

The Chief Financial Officer

206 The Chief Financial Officer must be an employee of the school. The CFO works in close collaboration with the Headteacher through whom he or she is responsible to the governors. The Chief Financial Officer also has direct access to the governors via the Finance Committee. The main responsibilities of the Chief Financial Officer are:

- the day to day management of financial issues including the establishment and operation of a suitable accounting system
- the management of the academy financial position at a strategic and operational level within the framework for financial control determined by the governing body
- the maintenance of effective systems of internal financial control
- ensuring that the annual accounts are properly presented and adequately supported by the underlying books and records of the academy
- the preparation of monthly management accounts
- signing cheques in conjunction with the Headteacher or other authorised signatory and
- ensuring forms and returns are sent to the DfE in line with the timetable in the DfE guidance
- Working with external auditors to produce end of year accounts in compliance with DfE requirements
- Updating this Financial Regulations Manual on an annual basis
- Collating governors 'Declaration of Interests'
- Publishing governors' Declaration of Interests on the school website.

Other Staff

207 Other members of staff, primarily the Finance Assistant and budget holders, will have some financial responsibilities and these are detailed in the following sections of this manual. All staff members are responsible for the security of academy property, for avoiding loss or damage, for ensuring economy and efficiency in the use of resources and for conformity with the requirements of the academy's financial procedures.

Register of Interests

208 It is important for anyone involved in spending public money to demonstrate that they do not benefit personally from the decisions they make. To avoid any misunderstanding that might arise, all academy governors and staff are required to declare any financial and business interests they have in companies or individuals from whom the academy may purchase goods or services. The register is open to public inspection.

209 The register should include all business interests such as directorships, share holdings or other appointments of influence within a business or organisation which may have dealings with the academy. The disclosures should also include business interests of relatives such as a parent or spouse or business partner where influence could be exerted over a governor or a member of staff by that person.

210 The existence of a register of business interests does not, of course, detract from the duties of governors and staff to declare interests whenever they are relevant to matters being discussed by the governing body or a committee. Where an interest has been declared, governors and staff should not attend that part of any committee or other meeting.

211 The trust publishes on its website in a separate readily accessible form the number of employees whose benefits exceeded £100k, in £10k bandings, as an extract from the disclosure in its financial statements for the previous year ended 31 August. Benefits for this purpose include salary, other taxable benefits and termination payments, but not the trust's own pension costs. In the case of employees who are trustees, their salary and other benefits will also be disclosed in £5k bandings in the trust's financial statements, as set out in the model trustees' remuneration note in the Academies Accounts Direction.

3. Accounting system

301 All the financial transactions of the academy must be recorded on the Access finance system. The Access finance system is operated by the Finance Department and consists of:

- Journals
- Nominal Ledger
- Bank Transactions
- Purchase Ledger
- Sales Ledger

System Access

- 302 Entry to the Access Financial system is password restricted and the Chief Financial Officer is responsible for implementing a system which ensures that passwords are changed at least every 3 months. When passwords are changed the new password should be placed in a sealed envelope and passed to the Chief Financial Officer to keep in the safe.
- 303 Access to the component parts of the Access finance system can also be restricted and the Chief Financial Officer is responsible for setting access levels for all members of staff using the system.

Back-up Procedures

- 304 The Assistant Headteacher in charge of School Systems is responsible for ensuring that there are effective back up procedures for the system. Data should be copied onto an external hard drive or other removable medium and the copies stored in a secure place, preferably in a fireproof container. Back up copies should be taken on at least a weekly basis.
- 305 The back-ups should not be recorded on the same medium each time as this results in only one copy being available. In order to provide more protection from the loss of data, at least three different storage media should be used in rotation and stored in different locations. At least one copy should be stored off-site.
- 306 The Chief Financial Officer should also prepare a disaster recovery plan in the event of loss of accounting facilities or financial data. This should link in with the annual assessment made by governors of the major risks to which the academy is exposed and the systems that have been put in place to mitigate those risks.

Transaction Processing

- 307 All transactions input to the accounting system must be authorised in accordance with the procedures specified in this manual. The detailed procedures for the operation of the payroll, the purchase ledger and the sales ledger are included in the following sections of the manual.

Transaction Reports

- 308 The Chief Financial Officer will obtain and review system reports to ensure that only regular transactions are posted to the accounting system. The report obtained and reviewed will include:
- the audit trail reports;
 - Finance Committee management account reports summarising expenditure and income against budget.

Reconciliations

309 The Chief Financial Officer is responsible for ensuring the following reconciliations are performed each month, and that any reconciling or balancing amounts are cleared:

- sales ledger control account
- purchase ledger control account
- payroll control account
- bank balance per the nominal ledger to the bank statement.

310 Any unusual or long outstanding reconciling items will be reviewed and queries addressed by the Chief Financial Officer.

4. Financial planning

401 The academy prepares both medium term and short-term financial plans.

402 The medium term financial plan is prepared as part of the development planning process. The development plan indicates how the academy's educational and other objectives are going to be achieved within the expected level of resources over the next three years.

403 The development plan provides the framework for the annual budget. The budget is a detailed statement of the expected resources available to the academy and the planned use of those resources for the following year.

404 The development process and the budgetary process are described in more detail below.

Development and Infrastructure Plans

405 The development and infrastructure plans are concerned with the future aims and objectives of the academy and how they are to be achieved; that includes matching the academy's objectives and targets to the resources expected to be available, including the maintenance of the academy's capital assets. Plans should be kept relatively simple and flexible. They are the "big picture" within which more detailed plans may be integrated.

406 The form and content of the development and infrastructure plans are matters for the academy to decide but due regard should be given to the matters included within the guidance to Academies and any annual guidance issued by the DfE.

407 Each year the Headteacher will propose a planning cycle and timetable to the governing body which allows for:

- a review of past activities, aims and objectives - "did we get it right?"
- definition or redefinition of aims and objectives – "are the aims still relevant?"
- development of the plan and associated budgets – "how do we go forward?"
- feedback into the next planning cycle – "what worked successfully and how can we improve?"

408 The completed development and infrastructure plan will include detailed objectives for the coming academic year. The plans should also include the estimated resource costs, both capital and revenue, associated with each objective.

409 For each objective the lead responsibility for ensuring progress is made towards the objective will be assigned to a senior manager. The responsible manager should monitor performance throughout the year and report to the Leadership team on a quarterly basis. The senior manager will report to the governing body if there is a significant divergence from the agreed plan and will recommend an appropriate course of action.

Annual Budget

410 The Chief Financial Officer is responsible for preparing and obtaining approval for the annual budget. The budget must be approved by the Headteacher, Finance Committee and the Governing Body.

411 The approved budget must be submitted to the DfE by 30 July each year and the Chief Financial Officer is responsible for establishing a timetable which allows sufficient time for the approval process and ensures that the submission date is met.

412 The annual budget will reflect the best estimate of the resources available to the academy for the forthcoming year and will detail how those resources are to be utilised. There should be a clear link between the development plan objectives and the budgeted utilisation of resources.

413 The budgetary planning process will incorporate the following elements:

- forecasts of the likely number of pupils to estimate the amount of DfE grant receivable
- review of other income sources available to the academy to assess likely level of receipts
- review of past performance against budgets to promote an understanding of the academy cost base
- identification of potential efficiency savings and
- review of the main expenditure headings in light of the development plan objectives and the expected variations in cost e.g. pay increases, inflation and other anticipated changes.

Balancing the Budget

414 Comparison of estimated income and expenditure will identify any potential surplus or shortfall in funding. If shortfalls are identified, opportunities to increase income should be explored and expenditure headings will need to be reviewed for areas where cuts can be made. This may entail prioritising tasks and deferring projects until more funding is available. Plans and budgets will need to be revised until income and expenditure are in balance. If a potential surplus is identified, this may be held back as a contingency or alternatively allocated to areas of need.

Finalising the Budget

415 Once the different options and scenarios have been considered, a draft budget should be

prepared by the Chief Financial Officer for approval by the Headteacher, the Finance Committee and the governing body. The budget should be communicated to all staff with responsibility for budget headings so that everyone is aware of the overall budgetary constraints.

- 416 The budget should be accompanied by a statement of assumptions and hierarchy of priorities (see the school development plan) so that if circumstances change, it is easier for all concerned to take remedial action. The budget should be seen as a working document which may need revising throughout the year as circumstances change.

Monitoring and Review

- 417 The trust must prepare management accounts every month setting out its financial performance and position. Managers must take appropriate action to ensure ongoing viability. Management accounts must be shared with the chair of trustees every month and with other trustees six times a year. The board must consider these when it meets. The board must ensure appropriate action is being taken to maintain financial viability including addressing variances between the budget and actual income and expenditure. The management accounts must include an income and expenditure account, variation to budget report, cash flows and balance sheet.
- 418 Any potential overspend against the budget must in the first instance be discussed with the Chief Financial Officer. The accounting system will not allow payments to be made against an overspent budget without the approval of the Chief Financial Officer.
- 419 The monitoring process should be effective and timely in highlighting variances in the budget so that differences can be investigated and action taken where appropriate. If a budget overspend is forecast, it may be appropriate to vire money from another budget or from the contingency. All budget virements must be authorised by the Headteacher within the limits set and then reported to the Finance Committee.

5. Payroll

501 The main elements of the payroll system are:

- staff appointments
- payroll administration and
- payments.

Staff Appointments

- 502 The governing body has approved a personnel establishment for the academy. Changes can only be made to this establishment with the express approval in the first instance of the Finance Committee who must ensure that adequate budgetary provision exists for any establishment changes.
- 503 The Headteacher has authority to appoint staff within the authorised establishment except for Deputy Headteachers and the Chief Financial Officer whose appointments must follow

consultation with the governors. The Chief Financial Officer maintains personnel files for all members of staff which include contracts of employment. All personnel changes must be notified to the Chief Financial Officer immediately.

Payroll Administration

504 The academy payroll is administered by Birmingham City Council, Corporate Payroll and Pensions.

All staff members are paid monthly by BACS payments via Birmingham City Council. A master file for each employee is held by Birmingham City Council and includes:

- salary
- bank account details
- taxation status
- personal details and
- any deductions or allowances payable.

505 New appointment details or adjustments can only be created by the Chief Financial Officer. Any amendments made by the Chief Financial Officer must be authorised by the Headteacher.

506 The Cover Co-ordinator and the HR/Office Administrator must complete a weekly staff return which provides details for all staff in their section of sickness and other absences during the week. The staff return must be authorised by the Headteacher. This will then be processed in accordance with the academy's Sickness Absence management and Leave of Absence policies.

New starters and leavers will be processed by the Chief Financial Officer.

507 Data input to the payroll system should be undertaken by the Chief Financial Officer in accordance with the timetable. Before the payroll is processed a print of all data input should be obtained and this should be checked against source documentation and initialled by the Headteacher.

Payments

508 After the payroll has been processed, but before payments are despatched, a print of salary payments by individual and showing the amount payable in total is sent from Birmingham City Council. This report must be reviewed and authorised by the Chief Financial Officer and the Headteacher.

509 The Chief Financial Officer will prepare a reconciliation between the current month's and the previous month's gross salary payments showing adjustments made for new appointments, resignations, pay increases, etc. This reconciliation should be reviewed and signed by the Headteacher.

510 The payroll system automatically calculates the deductions due from payroll to comply

with current legislation. The major deductions are for tax, National Insurance contributions and pensions. The amounts payable are summarised on the gross to net report and BACS payments for these amounts are automatically processed by them.

The Chief Financial Officer should select one employee at random each month and check the calculation of gross to net pay to ensure that the payroll system is operating correctly.

511 After the payroll has been processed the nominal ledger will be posted. The Chief Financial Officer will make postings to both the payroll control account and to individual cost centres.

6. Purchasing

601 The academy wants to achieve the best value for money from all our purchases. This means they want to get what they need in the correct quality, quantity and time at the best price possible. A large proportion of their purchases will be paid for with public funds and they need to maintain the integrity of these funds by following the general principles of:

- **Probity**, it must be demonstrable that there is no corruption or private gain involved in the contractual relationships of the academy;
- **Accountability**, the academy is publicly accountable for its expenditure and the conduct of its affairs;
- **Fairness**, that all those dealt with by the academy are dealt with on a fair and equitable basis.

Routine Purchasing

602 Budget holders will be informed of the budget available to them at least one month before the start of the academic year. It is the responsibility of the budget holder to manage the budget and to ensure that the funds available are not overspent. A print detailing actual expenditure against budget will be supplied to each budget holder half-termly and budget holders are encouraged to keep their own records of orders placed but not paid for.

603 Routine purchases up to the lower of their annual budget limit or £1,000 can be ordered by budget holders. In the first instance a supplier should be chosen from the list of approved suppliers maintained by the Chief Financial Officer's Office. A quote or price must always be obtained before any order is placed. If the budget holder considers that better value for money can be obtained by ordering from a supplier not on the approved supplier list, the reasons for this decision must be discussed and agreed with the Chief Financial Officer.

604 All orders must be placed using an internal requisition form, signed by the budget holder. An official order will be produced from the financial accounting system by the Finance Assistant. The Deputy Headteacher will authorise and print off the orders which will then be signed by the Deputy Headteacher. Orders are allocated an order number by the system and despatched or faxed to the supplier by the Finance Assistant.

605 The budget holder must make appropriate arrangements for the delivery of goods to the

academy. On receipt the budget holder must undertake a detailed check of the goods received against the original order and the goods received note (GRN) and make a record of any discrepancies between the goods delivered and the GRN. Discrepancies should be discussed with the supplier of the goods without delay. Agreed delivery notes should be signed and returned to the Chief Financial Officer's Office.

- 606 If any goods are rejected or returned to the supplier because they are not as ordered or are of sub-standard quality, the Chief Financial Officer's Office should be notified. The Finance Assistant will keep a central record of all goods returned to suppliers and also signed delivery notes.
- 607 The trust's funds must not be used to purchase alcohol for consumption, except where it is to be used in religious services.
- 608 All invoices will be reviewed by the Chief Financial Officer and stamped with a grid against which the following can be evidenced:
- order number
 - cost centre and ledger code details
 - invoice entered by
 - invoice authorised for payment
 - cheque number
 - date paid.
- 609 The Finance Assistant will attach the signed delivery note to the invoice and then enter the details onto the finance system. Any anomalies between the invoice amounts and the original order will be reported to the Chief Financial Officer to investigate.
- 610 On a fortnightly basis the Chief Financial Officer will review the outstanding invoices from the purchase ledger and pass to the Finance Assistant for payment.
- 611 The Finance Assistant will then input details of payments to be made to the purchase ledger and then generate the cheques or BACS payments as required. The cheques and BACS payments and associated paperwork must be signed and authorised by two of the nominated bank signatories.
- 612 Cheques and BACS payments will be dispatched to suppliers by the Finance Assistant who will also complete payment details on the invoices and then place in the appropriate file.

Orders less than £20,000

- 613 All orders and services up to the value of £20,000 to be authorised by the Headteacher. For goods and services over £10,000, at least three quotations should be obtained.

Orders over £20,000 but less than £50,000

- 614 At least three quotations should be obtained for all orders between £10,000 and £50,000 to identify the best source of the goods/services. Written details of quotations obtained should

be prepared and retained by budget holders for audit purposes. Telephone quotes are acceptable if these are evidenced and faxed confirmation of quotes has been received before a purchase decision is made. All goods/services ordered with a value over £20,000, or for a series of contracts which in total exceed £20,000, must have the prior approval of the Finance Committee. However, there may be cumulative spend of more than £20,000 with certain suppliers and for general day to day repairs to site. In these cases, best value is continuously monitored.

Orders over £50,000

615 All goods/services ordered with a value over £50,000, or for a series of contracts which in total exceed £50,000, will be subject to formal tendering procedures. Purchases over £118,133 (threshold from 01/01/2018) may fall under EU procurement rules which requires advertising in the Official Journal of the European Union. Guidance on the OJEU thresholds is given in Annex D in the Academies Financial Handbook.

Forms of Tenders

616 There are three forms of tender procedure: open, restricted and negotiated and the circumstances in which each procedure should be used are described below.

Open Tender

This is where all potential suppliers are invited to tender. The budget holder must discuss and agree with the Chief Financial Officer how best to advertise for suppliers e.g. general press, trade journals or to identify all potential suppliers and contact directly if practical. This is the preferred method of tendering, as it is most conducive to competition and the propriety of public funds.

Restricted Tender

This is where suppliers are specifically invited to tender. Restricted tenders are appropriate where:

- there is a need to maintain a balance between the contract value and administrative costs,
- a large number of suppliers would come forward or because the nature of the goods are such that only specific suppliers can be expected to supply the academy's requirements,
- the costs of publicity and advertising are likely to outweigh the potential benefits of open tendering.

Negotiated Tender

The terms of the contract may be negotiated with one or more chosen suppliers. This is appropriate in specific circumstances:

- the above methods have resulted in either no or unacceptable tenders
- only one or very few suppliers are available

- extreme urgency exists
- additional deliveries by the existing supplier are justified.

Preparation for Tender

617 Full consideration should be given to:

- objective of project
- overall requirements
- technical skills required
- after sales service requirements
- form of contract.

618 It may be useful after all requirements have been established to rank requirements (e.g. mandatory, desirable and additional) and award marks to suppliers on fulfilment of these requirements to help reach an overall decision.

Invitation to Tender

619 If a restricted tender is to be used, then an invitation to tender must be issued. If an open tender is used an invitation to tender may be issued in response to an initial enquiry.

620 An invitation to tender should include the following:

- introduction/background to the project
- scope and objectives of the project
- technical requirements
- implementation of the project
- terms and conditions of tender and
- form of response.

Aspects to Consider

Financial

- Like should be compared with like and if a lower price means a reduced service or lower quality this must be borne in mind when reaching a decision.
- Care should be taken to ensure that the tender price is the total price and that there are no hidden or extra costs.
- Is there scope for negotiation?

Technical/Suitability

- Qualifications of the contractor
- Relevant experience of the contractor
- Descriptions of technical and service facilities
- Certificates of quality/conformity with standards
- Quality control procedures
- Details of previous sales and references from past customers.

Other Considerations

- Pre sales demonstrations
- After sales service
- Financial status of supplier. Suppliers in financial difficulty may have problems completing contracts and in the provision of after sales service. It may be appropriate to have an accountant or similarly qualified person examine audited accounts etc.

Tender Acceptance Procedures

621 The invitation to tender should state the date and time by which the completed tender document should be received by the academy. Tenders should be submitted in plain envelopes clearly marked to indicate they contain tender documents. The envelopes should be time and date stamped on receipt and stored in a secure place prior to tender opening. Tenders received after the submission deadline should not normally be accepted.

Tender Opening Procedures

622 All tenders submitted should be opened at the same time and the tender details should be recorded. Two persons should be present for the opening of tenders as follows:

- The Headteacher, the Chief Financial Officer plus a member of the Finance Committee.

623 A separate record should be established to record the names of the firms submitting tenders and the amount tendered. This record must be signed by both people present at the tender opening.

Tendering Procedures

- 624 The evaluation process should involve at least two people. Those involved should disclose all interests, business and otherwise, that might impact upon their objectivity. If there is a potential conflict of interest, then that person must withdraw from the tendering process.
- 625 Those involved in making a decision must take care not to accept gifts or hospitality from potential suppliers that could compromise or be seen to compromise their independence.
- 626 Full records should be kept of all criteria used for evaluation and a report should be prepared for the Finance Committee highlighting the relevant issues and recommending a decision.
- 627 Where required by the conditions attached to a specific grant from the DfE, the department's approval must be obtained before the acceptance of a tender.
- 628 The accepted tender should be the one that is economically most advantageous to the academy. All parties should then be informed of the decision.

7. Income

- 701 The main source of income for the academy is the grant from the DfE. The receipt of all income is monitored directly by the Chief Financial Officer who is responsible for ensuring that all grants due to the academy are collected.
- 702 The academy also obtains income from:
- parents, for trips, before and after school club and extended services.

Trips

- 703 A lead teacher must be appointed for each trip to take responsibility for the booking of the trip venue and costing. The Finance Administrator will administer the collection of monies and ordering of coaches.
- 704 Parents should make payments via Parent Pay using debit card or pay point.
- 705 The Finance Administrator should maintain an up-to-date record for each student showing the amount paid and the amount outstanding. This record should be sent to the lead teacher on a weekly basis and the lead teacher is responsible for chasing the outstanding amounts.

Lettings

- 706 The Chief Financial Officer is responsible for maintaining records of bookings of halls and for identifying the sums due from each organisation. Payments must be made in advance for the use of facilities.

Custody

- 707 All payments to school must be sent via Parent Pay. The Finance Administrator reconciles payments on Parent Pay. The Finance Assistant reconciles trip accounts. The payments from Parent Pay are entered onto Access by the Chief Financial Officer. Any cash or cheques collected via School Office must be kept in the Chief Financial Officer's Office safe prior to banking. If there is any cash in the safe collected from parents, banking should take place every week or more frequently if the sums collected exceed the £1,000 insurance limit on the Chief Financial Officer's Office safe. Any balances on ParentPay from dinner accounts over £5.00 to be refunded or transferred to siblings. Other balances will remain in the system. Parents may be refunded under £5.00 with written request to the school.
- 708 Monies collected must be banked in their entirety in the appropriate bank account. The Finance Assistant is responsible for preparing the banking deposits weekly. The Chief Financial Officer checks the deposits before they are collected by the cash collection agency. The sums deposited at the bank along with all payments made by parents for services will be posted onto Access by the Finance Assistant. Amounts banked will be reconciled by the Chief Financial Officer during the bank reconciliation process.

8. **Cash Management**

Bank Accounts

- 801 The opening of all accounts must be authorised by the governing body who must set out, in a formal memorandum, the arrangements covering the operation of accounts, including any transfers between accounts and cheque signing arrangements. The operation of systems such as Bankers Automatic Clearing System (BACS) and other means of electronic transfer of funds must also be subject to the same level of control.

The trust must manage its cash position robustly. It must avoid becoming overdrawn on any of its bank accounts so that it does not breach restrictions on borrowing. It may be required to report on its cash position to ESFA where there are concerns about financial management.

Deposits

- 802 Particulars of all deposits are recorded on the copy paying-in slip. The details include:
- the amount of the deposit
 - the name of the debtor
 - and the total income banked broken down over different cost centres.

Payments and withdrawals

803 All cheques and other instruments authorising withdrawal from academy bank accounts must bear the signatures of two of the following authorised signatories, except cheques over £5,000 whereby the Headteacher cannot sign:

Headteacher

Deputy Headteacher

Chief Financial Officer

804 This provision applies to all accounts, public or private, operated by or on behalf of the governing body of the academy. Authorised signatories must not sign a cheque relating to goods or services for which they have also authorised the expenditure. The purchasing system provides a division of duties.

Administration

805 The Chief Financial Officer must ensure bank statements are reconciled regularly and at least on a monthly basis. Reconciliation procedures must ensure that:

- all bank accounts are reconciled to the academy's finance system
- reconciliations are prepared by the Chief Financial Officer
- reconciliations are subject to an independent review carried out twice yearly following the programme of works agreed by the Finance Committee
- adjustments arising are dealt with promptly.

Petty Cash Accounts

806 The academy does not hold petty cash in the office. All petty cash payments are made by cheque or BACS payments directly from the main bank account as a non-order invoice.

Deposits

807 The only deposits to petty cash should be from cheques cashed specifically for the purpose. The receipt should be recorded in the petty cash system with the date, amount and a reference, normally the cheque number, relating to the payment. All other cash receipts for whatever reason should be paid directly into the bank.

Cash Flow Forecasts

808 The Chief Financial Officer is responsible for preparing cash flow forecasts to ensure that the academy has sufficient funds available to pay for day to day operations. If significant balances can be foreseen, steps should be taken to invest the extra funds.

Investments

809 Investments must be made only in accordance with written procedures approved by the governing body.

810 All investments must be recorded in sufficient detail to identify the investment and to enable the current market value to be calculated. The information required will normally be the date of purchase, the cost and a description of the investment. Additional procedures may be required to ensure any income receivable from the investment is received.

Debit Cards

811 The Debit Card should be in the school's name, if more than one user is required then each person should have a separate Debit Card and each Debit Card should have an individual identification number and pin number, so each purchase can be traced to the relevant individual. When a Debit Card is used the school should raise a confirmation order to create a commitment on the system within 24 hours or as soon as possible. The money is to be transferred from the main account, the bank can be informed by fax for the transfer and must be signed by two signatories from the mandate. The limit is £500.00. The debit card must be stored securely in a safe. The Debit Card must not be shared with other staff.

9. Whistleblowing Process

901 The trust has procedures for whistleblowing to protect staff who report individuals they believe are doing something wrong or illegal. The trust should appoint at least one trustee and one member of staff who other staff can contact to report concerns. The trust must ensure all staff are aware of the whistleblowing process and how the concerns will be managed and what protection is available to them. The trust must ensure all concerns raised with them by whistleblowers are responded to properly and fairly. See separate Whistleblowing Policy which is published on the school website.

Internal Scrutiny

902 All academy trusts must have a programme of internal scrutiny to provide independent assurance to the board that its financial and others controls, and risk management procedures, are operating effectively.

Internal scrutiny must focus on:

- evaluating the suitability of, and level of compliance with, financial and non-financial controls. This includes assessing whether procedures are designed effectively and efficiently, and checking whether agreed procedures have been followed
- offering advice and insight to the board on how to address weaknesses in financial and non-financial controls, acting as a catalyst for improvement, but without diluting management's responsibility for day to day running of the trust
- ensuring all categories of risk are being adequately identified, reported and managed.

Internal scrutiny should take account of output from other assurance procedures to inform the programme of work. It should have regard to recommendations from the trust's external auditors as described in their management letter, and from relevant reviews

undertaken by ESFA.

The academy trust must establish an audit committee, appointed by the board.

The audit committee should meet at least three times a year.

The audit committee's role must include directing the trust's programme of internal scrutiny and reporting to the board on the adequacy of the trust's financial and other controls and management of risks. The committee must have written terms of reference, review the risk register to inform the programme of work and have access to the external auditor as well as those carrying out internal scrutiny, and consider their quality.

The trust must deliver internal scrutiny in the way most appropriate to its circumstances. Options include:

- employing an in-house internal auditor
- a bought-in internal audit service from a firm, other organisation or individual with professional indemnity insurance
- the appointment of a non-employed trustee
- a peer review by the chief financial officer from another academy trust. The trust should satisfy itself that the trust supplying the reviewer has a good standard of financial management and governance and should minute the basis for its decision. The peer reviewer should be independent of the trust and not the external auditor.

10. Fixed assets – see separate Fixed Asset Policy

APPENDIX 1

Seven Principles of Public Life

1. Selflessness

Holders of public office should act solely in terms of the public interest.

2. Integrity

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

3. Objectivity

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

4. Accountability

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

5. Openness

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

6. Honesty

Holders of public office should be truthful.

7. Leadership

Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.