

Financial Regulations & Scheme of Delegation

Southend High School for Girls Academy Trust



Southend High School for Girls

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Reviewing authority: Finance, Audit & Risk Committee / Board of Governors

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Financial Scheme of Delegation/Authorisation & Approval Summary

Expenditure Limits/Ordering Procedures

If approval for a contract that spans more than one year, the limits below apply to the total value over the life of the contract not the per annum cost.

Process	Value	Delegated Authority
Expenditure Approval	up to £10,000	Headteacher
Expenditure Approval	£10,001 to £25,000	Finance, Audit & Risk Committee
Expenditure Approval	Over £25,000	Board of Trustees
3 competitive quotations	£10,000 to £25,000	
Formal Tender Process required	Over £25,000	Board of Trustees would usually oversee process in conjunction with a specialist Requirements to publish notices when awarding contracts.
'Find a Tender' Tendering Procedure	Above £122,976	
Related Party Transactions	Over £20,000	ESFA approval required prior to entering into transaction. All related party transactions, regardless of value, must be reported to the ESFA

Cheque/Standing Order/Direct Debit/BACS Signatories

Value	Delegated Authority	Additional Guidance
Unlimited.	Headteacher	Ensure bank mandate is complied with – any two signatories . Remote working – the same signatories and electronic payments procedures will be in place.
Up to £250k	Director of Finance & Business Deputy Headteacher / Assistant H/T's HR & Finance Manager (including payroll related costs)	

Virement Approval

Value	Delegated Authority	Additional Guidance
Up to £3,000	Director of Finance & Business	All virements must be recorded for Board of Trustees
Up to £10,000	Headteacher (or Deputy Headteacher in H/T absence)	
Urgent cases Up to £20,000	H/T and Chair of Governors	
Unlimited reallocations	Finance, Audit & Risk Committee	

Disposal of Surplus Stock, Stores & Assets

Value	Delegated Authority	Additional Guidance
Up to £250	Headteacher	
£251 to £1,000	Finance, Audit & Risk Committee	

Over £1,001 to ESFA Approval limits	Board of Trustees	
Check Academy Trust Handbook for latest guidance	ESFA Approval/Notification	

Write off of Bad Debts

Value	Delegated Authority	Additional Guidance
Up to £100	Chief Financial Officer	
£101 to £250	Headteacher	
£251 to £1,000	Finance, Audit & Risk Committee	
Over £1,001 to ESFA Approval limits	Board of Trustees	
Check Academy Trust Handbook for latest guidance	ESFA Approval	

Approval of Returns & Reconciliations

Return	Delegated Authority	Additional Guidance
VAT 126 Return or VAT return if registered	Finance Officer	
Bank Reconciliations	HR & Finance Manager	To be prepared at least monthly
Funding Reconciliation	Chief Financial Officer	To be prepared at least monthly
Budget Forecast Return Outturn Budget Forecast Return 3Y	Chief Financial Officer to prepare, Accounting Officer to approve	
Risk Register	Finance, Audit & Risk Committee to prepare and review. Board of Trustees to monitor and review	
Register of Business Interests	Board of Trustees	
Gifts and Hospitality Register	Finance, Audit & Risk Committee	
Business Continuity Plan	Board of Trustees	
Financial Management and Governance Self Evaluation	Board of Trustees	
Schools Resource Management Self-Assessment Tool	Trust Board	

Other Monetary Limits

	Limit	Additional Guidance
Mileage Allowance	HM Revenue and Customs approved rate	
Petty Cash Imprest	£300 and £200 Academy/school fund	
Safe Cash/Cheque Limits	£10,000 Cash £250,000 cheques and other certificates, bonds, stamps as detailed in RPA rules	

	£5,000 monetary not in a locked safe e.g. in transit or at an authorised employee's home	
Inventory Register	Items that are portable and attractive over £250	
Asset Register	Capitalisation limit £1,000	Enter capitalisation amount as per accounting policy

The finance policies listed below should be read in conjunction with the trusts other financial management related policies and the government's Academy Trust Handbook;

- Accounting Policy
- Gifts and Hospitality Policy
- Reserves Policy
- Fraud and Irregularity Policy
- Risk Management Policy
- Whistle Blowing Policy
- Lettings Policy
- Bad Debt Policy

1.0 INTRODUCTION

- 1.1 The purpose of these regulations is to ensure that the academy trust 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 The Trust's funding agreement with the Department for Education (DfE).
- 1.2 The academy must comply with the principles of financial control outlined in the Academy Trust Handbook published by the DfE. These regulations expand on that and provide detailed information on the academy's accounting procedures and systems and should be read by all staff involved with financial systems.
- 1.3 The general conditions that follow are subject to annual review and consideration by the Board of Trustees, whom must formally minute both the review and any subsequent amendments and approval each year.
- 1.4 The Board of Trustees confirms that failure to observe these conditions is considered a serious matter and might involve disciplinary procedures being taken against the individual concerned.

2.0 ORGANISATION

- 2.1 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 Members

- 2.2 The members have a similar role to shareholders of a company. Their role is to be kept informed about trust business and should be 'eyes on and hands off.'
- 2.3 Members must not be employees of the trust or carry out any unpaid staff roles on a voluntary basis.

The Board of Trustees

- 2.4 The Board have overall responsibility for the administration of the academy's finances and for maintaining the trust as a going concern. The main responsibilities of The Board are prescribed in the Funding Agreement between the academy trust and the DfE and in the academy's scheme of delegation. The responsibilities of The Board are as outlined in the scheme of delegation and also in the Academy Trust Handbook
- 2.5 The trust board meets at least 6 times per year in accordance with the Academy Trust Handbook.

Accounting Officer

- 2.7 The academy trust has designated the Headteacher as its Accounting Officer. Whilst the Accounting Officer has responsibility, under the board's guidance, for the trust's overall management and staffing, their appointment as Accounting Officer confers specific responsibilities for financial matters. In particular, the Accounting Officer is personally responsible to Parliament, and to the Accounting Officer of the ESFA, for the resources under their control, and must be able to assure Parliament and the public of high standards of probity in the management of public funds.
- 2.8 The essence of the role is a personal responsibility for:
- regularity – dealing with all items of income and expenditure in accordance with legislation, the terms of the trust's funding agreement and these regulations, and compliance with internal trust procedures. This includes spending public money for the purposes intended by Parliament;
 - propriety – the requirement that expenditure and receipts should be dealt with in accordance with Parliament's intentions and the principles of Parliamentary control. This covers standards of conduct, behaviour and corporate governance;
 - value for money – this is about achieving the best possible educational and wider societal outcomes through the economic, efficient and effective use of all the resources in the trust's charge, the avoidance of waste and extravagance, and prudent and economical administration. A key objective is to achieve value for money not only for the academy trust but for taxpayers more generally.
- The Accounting Officer also has responsibilities for keeping proper financial records and accounts, and for the management of opportunities and risks.
- 2.9 Whilst the Accounting Officer is accountable for the academy trust's financial affairs, the delivery of the trust's detailed accounting processes will be delegated to the Chief Finance Officer.
- 2.10 The Accounting Officer must advise The Board in writing if, at any time, in his or her opinion, any action or policy under consideration by them is incompatible with the terms of the

Handbook or Funding Agreement (FA). Similarly, the Accounting Officer must advise the board in writing if the board appears to be failing to act where required to do so by the terms and conditions of the Handbook or FA. Where The Board is minded to proceed, despite the advice of the Accounting Officer, the Accounting Officer must consider the reasons the board gives for its decision. If, after considering the reasons given by the board, the Accounting Officer still considers that the action proposed by the board is in breach of the Handbook or FA, the accounting officer must advise the ESFA's accounting officer of the position in writing

Chief Financial Officer (Director of Finance & Business)

2.11 The Chief Financial Officer works in close collaboration with the Accounting Officer through whom he or she is responsible. The Chief Financial Officer also has direct access to the Board of Trustees via the Finance, Audit & Risk Committee. The main responsibilities of the Chief Financial Officer are as outlined in the post holder job description. The CFO is the Director of Finance & Business.

Finance, Audit & Risk Committee

2.12 The academy trust will have a Finance Committee, which also fulfils the role of an Audit & Risk Committee, who will work in close collaboration with the academy trust's central staff. The committee meets at least once per term, but more frequent meetings can be arranged if necessary. The main responsibilities of the Finance, Audit & Risk Committee are detailed in the written terms of reference which have been authorised by the board and include the following:

- Review the annual budget before sending for approval to The Board
- Determining the school's financial priorities through the School Development Plan (SDP) and the Asset Management Plan (AMP).
- Receiving monthly management reports, to facilitate the monitoring of the school's actual financial performance compared with budgeted priorities and cash flow, and to take remedial action as necessary.
- Making decisions on expenditure within the Finance, Audit & Risk Committees' delegated powers.
- Making decisions on virements within agreed budgets, within the Finance, Audit & Risk Committee's delegated powers, and authorising any budgetary adjustments made.
- Ensuring the Register of Business Interests is kept up to date and published on the academy website.
- Ensuring the gift and hospitality register is kept up to date
- Annually reviewing all on-going contracts
- Monitoring all spending and income received in the academy
- Ensuring that funding from the ESFA, Local Authority and other sources is used only in accordance with any conditions attached.
- Receiving and commenting on the content of any audit report and monitoring the implementation of the agreed action plan.
- Agreeing and determining appropriate charges for lettings of the premises.

- Ensuring the academy adheres to the policies and procedures as specified by The Board
 - Ensuring the academy has appropriate internal financial controls in place
 - Reviewing and monitoring of budget projections / medium term financial plans to ensure the school's budget is realistic and any financial decisions are sustainable.
 - Declaring any connected party transactions or business interests
 - Regularly updating and monitoring the risk register and ensuring the implementation of any mitigating actions.
 - Ensuring the academy has an up to date business continuity plan
- 2.13 The Finance, Audit & Risk Committee confirms that the day-to-day financial management of the school is delegated to the Headteacher, subject to exceptions contained in these regulations. Throughout these conditions, delegation to the Headteacher shall imply further delegation to the Deputy Headteacher when the Headteacher is not on the school site. Where the Headteacher wishes to permanently delegate certain financial matters or activities, then the level of that delegation shall be notified in writing to the individual(s) concerned, reported to the Finance, Audit & Risk Committee in writing and incorporated into these conditions.

Director of Finance & Business

- 2.14 For the purposes of this document the term Director of Finance & Business (DFB) refers to the person responsible for the day to day management of the academy's financial operations (CFO). The academy should employ a suitably experienced DFB to support the Headteacher and Finance, Audit & Risk Committee to manage and protect resources appropriately.
- 2.15 The DFB will work with the Headteacher and Senior Leadership Team to ensure the academy's financial processes and finance policies are followed. They will be responsible for the effective use of resources within the organisation and will notify the Headteacher of any issues.

Clerk to the Board

- 2.16 The academy trust will appoint a suitably qualified clerk to the board who is someone other than a trustee or the headteacher of the trust.

General Requirement

- 2.17 All employees of the academy are expected to act professionally and with integrity and follow the internal control framework and financial policies of the academy. All staff with financial management responsibilities should have access to the information and training required to perform their financial duties.

Register of Interests

- 2.18 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 with significant financial or spending powers are required to declare any financial interests they have in companies or individuals from which the academy may purchase goods or services. The register is open to public inspection.

The register should include all business interests such as directorships or shareholdings. 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.

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 withdraw from that part of any committee or other meeting.

All Governors and school staff must be given the opportunity to verbally declare previously undeclared interests, and any previously declared interests that may be relevant to the agenda, at every committee and Governing Body meeting.

In accordance with the Academy Trust Handbook the business interests of the Board of Trustees will be published on the academy's website and it will be kept up to date at all times.

Trading with Connected Parties

2.19 In accordance with the Academy Trust Handbook the following will apply to goods or services provided by individuals or organisations connected to the academy trust:

The trust must pay no more than 'cost' for goods or services provided by a connected party as defined by the Academy Trust Handbook.

The academy must ensure that any agreement with a connected party is procured through an open and fair process and is supported by a statement of assurance from the individual or organisation to the trust confirming that their charges do not exceed the cost of goods or services.

The 'at cost' requirement applies to any transactions for goods or services exceeding £2,500 cumulatively in a financial year.

Related Party Transactions

2.20 Trustees must ensure they avoid conflicts of interest, do not accept benefits from third parties and declare interests in proposed transactions and arrangements. No member, trustee, governor, employee or related individual or organisation may use their connections for personal gain and no payments can be made to trustees unless permitted by the articles or by authority from the Charity Commission.

2.21 Trustees must report all transactions to related parties to the ESFA in advance of the transaction taking place, using the ESFA's on-line form.

2.22 Trustees must obtain ESFA's approval for related party transactions that are;

- novel, contentious and or/repercussive

- the contract exceeds £20,000

- a contract of any value that would take the total value of contracts with the related party beyond £20,000 in the same financial year

3.0 DAY-TO-DAY DELEGATION OF AUTHORITY

Expenditure Limits

- 3.1 The Headteacher may authorise all budgeted expenditure. The Headteacher may authorise non-budgeted expenditure up to £10,000 on goods and services. Avoidance of obtaining higher authority by raising a sequence of smaller orders in place of one large order is not permitted.

If the value to be authorised exceeds the Headteacher's limit for unbudgeted goods and services then a higher level of approval is required, as specified below.

Authorisation for all unbudgeted expenditure that is between the values of £10,001 and £25,000 must be referred to the Finance, Audit & Risk Committee. The Chair of the Finance, Audit & Risk Committee has authority to approve all such expenditure on behalf of the Finance, Audit & Risk Committee.

Authorisation for unbudgeted expenditure above £25,000 must be referred to The Board.

Funding

- 3.2 The Finance, Audit & Risk Committee will ensure that information submitted to the DfE and ESFA that affects funding is accurate and complete.
- 3.3 The board of trustees will challenge pupil number projections and review these termly as part of the Headteachers report to the board of governors meetings.
- 3.4 The CFO is responsible for reconciling the trust's funding budget entered on the school's financial accounting system with the monthly funding information provided by the ESFA and other government agencies. This reconciliation should be completed on a monthly basis. Monthly budget monitoring will highlight any funding variances which are reviewed by governors and the Accounting Officer.

Bad Debts

- 3.5 The Trust should always pursue recovery of amounts owed to it, including overpayments or erroneous payments. In practice, however, there will be practical and legal limits to how cases should be handled. The Trust should only consider writing-off after careful appraisal, including whether all reasonable recovery action has been taken with the debtor or the trust's insurers and should be satisfied there is no feasible alternative.
- 3.6 The write-off of debts owed to the school, can be approved as follows:

Up to £100 – CFO

£101 to £250 – Headteacher

£251 to £1,000 – Finance, Audit & Risk Committee

Over £1,001 up to ESFA approval required limits (see Academy Trust Handbook) – Board of Trustees

A sequence of smaller write offs, all within the above limits, to cover a larger write off is not permitted.

Disposal of Assets or Adjustments to School Inventory

3.6 The Headteacher can authorise the disposal / adjustment of recorded school inventory items up to the value of £250. Authority for disposals / adjustments above this amount and up to £1,000 must be approved by the Finance, Audit & Risk Committee. Disposals/adjustments above £1,001 and up to the ESFA approval limits (check AFH) must be referred to The Board.

All disposals / adjustments must be formally recorded in the minutes of the meeting at which they were reported and discussed.

Mileage Allowances and Subsistence Claims

3.7 The academy will reimburse mileage expenses to individuals for business journeys at a rate in accordance with the limitations set out by HM Revenue & Customs. The claimant is entitled to be notified of this rate in advance of commencing their journey. The claimant must have suitable insurance in place to cover both the vehicle and passengers. A VAT registered fuel receipt must accompany every mileage claim, indicating that duty has been paid on sufficient fuel for the distance covered in order for the school to be able to reclaim VAT.

- All expense claims are to be authorised by both the Line Manager and DFB / Headteacher.
- All claims relating to the Headteacher are to be authorised by the DFB / Deputy Headteacher.
- All expense claims are to be supported by VAT receipts (or other appropriate evidence of expenditure) which must be attached to the claim. Claims for subsistence can only be claimed to the maximum stated below.
- Rates of subsistence will be paid at the rate and within the conditions that adhere to the Academy Trusts staff expense policy on travel and subsistence allowances.
- Claims for the purchase of alcohol will not be reimbursed.
- The academy may not reclaim VAT without a proper VAT receipt.

Receiving of Goods / Acknowledgement of Service

3.8 The person accepting the goods will be responsible for signing the delivery note to confirm the correct goods have been received. This will then be processed on the system by the FO who will record on the financial accounting system who has checked the goods.

Staff Appointments/Terminations

3.9 The Board of Trustees have approved a personnel establishment for the trust. Changes can only be made to the establishment with the express approval of The Board who will also ensure that adequate budgetary provision exists for any changes.

3.10 The approval required for the appointment of staff or changes to contract is as follows:

Headteacher Appointment	The Trust Board
All other staff	Headteacher subject to the agreed establishment and budget constraints and in accordance with the Trusts recruitment and appointment policy.
Chief Financial Officer	The Trust Board

- 3.11 All relevant forms and paperwork with regard to the appointment of, or amendment to contracts of staff should be sourced from the trusts Human Resources service provider. All personnel pre-employment checks should be completed, and relevant clearances obtained for all staff before they start their employment.
- 3.12 The Board has authority to approve individual staff severance payments and compensation payments as per the Academy Trust Handbook, providing the non-statutory / non contractual element is under £50,000. Above £50,000 prior approval must be sought for the non-contractual element from the ESFA.

Payment of Additional Hours

- 3.13 With regard to staff overtime etc, the Headteacher is authorised to incur expenditure up to the level agreed within the overall salary annual budgets. Unbudgeted expenditure is authorised in line with expenditure limits within Section 3.1 above. No overtime should be undertaken without the prior approval of the relevant line manager.

Monitoring Salary Payments

- 3.14 It is the responsibility of the HR & Finance Manager to ensure that systems are in place to record all staff contract details and that they are regularly updated to take account of new appointments, amendments and terminations of employment. This will ensure that all information on the school's financial accounting system is correct and will avoid distortion of financial information.

Any payroll contractual changes relating to the Headteacher will be authorised by the Trust Board.

Supply Staff

- 3.15
- a) All supply staff will be appointed by the Headteacher or as otherwise directed by the Headteacher. At the same time for long term cover the appropriate commitment for the estimated costs incurred will be entered on to the school finance system or will be met by a vacancy commitment. It is the responsibility of the HR & Finance Manager to ensure this is done.
 - b) It is the responsibility of the individual member of staff to agree with their line manager the hours worked in the particular payment period. The line manager will then authorise the claim and forward it to the HR & Finance Manager. If a dispute arises over hours claimed, the Headteacher will be informed immediately.

Contract Approval

- 3.16 Any contractual commitment with a term of longer than 12 months, including lease agreements, will require the approval of The Board.

By law an operating lease is the only type of lease available to schools. These leases involve the school paying a rental for the hire of an asset for a period of time and have the character of a rental agreement. No other lease, such as finance leases or hire purchase, may be entered into by the school as this is a form of borrowing.

Insurance

3.17 Insurance cover for the academy will be arranged at Trust Board level. Insurance will cover will include:

Public Liability

Buildings and Contents

Terrorism

Business Interruption

Employer Liability

Hirers Liability

Governors Liability

School Journey

Personal Accident

Motor

Engineering

If maternity or sick pay insurance is required, this will be arranged by the Finance, Audit & Risk Committee.

Business continuity plans should be established by the Headteacher and CFO and reviewed annually.

4.0 FINANCIAL PLANNING AND REVIEW

Budget Planning / Setting

4.1 The school's overall budget plans (both one year annual and multiyear forward financial plans) will be prepared by the Headteacher and CFO in consultation with the Finance, Audit & Risk Committee. The budget will be prepared having regard to all known needs of the school including the School Improvement / Development Plan and the Asset Management Plan. It is the responsibility of the CFO to ensure that all the required budgets are approved by the Finance, Audit & Risk Committee and submitted to The Board in accordance with the published timetable.

4.2 Detailed records will be kept of all information used in preparing the budget, including estimations of staffing requirements and calculations of all costs, cross referenced to the assumptions made.

4.3 The Chief Financial Officer and Finance Officer's will be responsible for ensuring that the school has budget business plans in place for all trading activities e.g. catering, uniform sales, lettings etc. The business plan should clearly show the anticipated operating surplus or deficit. If a subsidy is required from the Delegated Fund to cover a budgeted deficit, then this must be formally approved by the Finance, Audit & Risk Committee and recorded in the minutes of the meeting at which it was discussed and agreed. All budgeted business plans should be clearly linked to the School Development Plan.

- 4.4 The school budget will be reviewed by the Finance, Audit & Risk Committee and submitted to The Board for final approval.
- 4.5 The approved budget should be promptly loaded onto the school's financial accounting system.
- 4.6 A copy of the budget plan is to be placed in the governor meeting papers / minute file.

Budget Monitoring

- 4.7 The CFO will be responsible for monitoring actual income and expenditure against budget for each line item and producing and circulating appropriate reports to the Finance, Audit & Risk Committee and Trust on a monthly basis. Urgent budget issues will be reported to the Finance, Audit & Risk Committee immediately.
- 4.8 The HR & Finance Manager will circulate monthly management accounts, including income and expenditure reports on an accruals basis, cash flow forecasts and balance sheets to the Finance, Audit & Risk Committee and Trust Board, together with a written explanation of significant variances against budget, and with a projection of income and expenditure to the year-end.
- 4.9 The CFO will prepare medium term financial forecasts and present them to the board twice a year.

Resource Management

- 4.10 The trust will ensure that it manages its resources effectively. To support with fulfilling this responsibility they will ensure that the following is carried out;
- Carrying out regular benchmarking with other trusts in a similar context
 - Annually completing the Schools Resource Management Tool and preparing an action plan. The completed tool must be submitted to the ESFA by their required deadline.
 - Engaging with the DfE's approved frameworks when procuring goods and services. This includes using Find a Tender through the Government portal for procurement over the relevant thresholds.
 - Ensuring curriculum is integrated with the trusts financial planning strategy
 - Ensuring school staffing structure is reviewed regularly and is integrated with the trusts financial planning strategy.

Financial Returns

- 4.11 The CFO will be responsible for preparing all the financial returns required by the Education Skills Funding Agency. All returns will be completed in the required timescales.
- 4.12 In order to give a true and fair view the financial statements for the annual accounts must be prepared according to the requirements of the Companies Act 2006 and Regulations made under the Act, and applicable United Kingdom accounting standards. Academy Trusts must

also prepare their accounts in accordance with the Statement of Recommended Practice - Accounting and Reporting by Charities (revised) ('the SORP'). They must also be prepared in accordance with the accounting policies agreed by the The Board. A copy of the SORP together with accompanying information sheets, other Charity Commission guidance and legislation are available to view and download from the Charity Commission website at:

http://www.charitycommission.gov.uk/Charity_requirements_guidance/Accounting_and_reporting/Preparing_charity_accounts/

- 4.13 The Trust Board is responsible for approving the academy's annual accounts and annual report and ensuring the annual accounts are audited and submitted to the Education Skills Funding Agency by the required deadlines. Details of the all financial information required are as set out in the latest Accounts Direction for the year being reported.
- 4.14 In addition to submitting accounts to the Education Skills Funding Agency, under section 442 (2a) of the Companies Act 2006, accounts must be filed with Companies House within 9 months of the end of the accounting period.
- 4.15 The ESFA require the Academy to publish its Annual Accounts and Annual Report by 31st January. This will be done via the academy's trusts website.
- 4.16 The trust's audited accounts must be provided to the members.

5.0 INTERNAL CONTROL

The objectives of Internal Control are to give the Academy Trust confidence that as far as is reasonably possible:

- a) the academy's accounting records are accurate and complete
 - b) the financial procedures in operation minimise the risks of misappropriation of funds and assets
 - c) the trust achieves best value.
- 5.1 The HR & Finance Manager is responsible for carrying out monthly bank statement reconciliations for all bank accounts in a timely manner. All discrepancies are to be investigated immediately and reported to the CFO and, if appropriate, the bank.
 - 5.2 The Finance Officer is responsible for ensuring that VAT transactions are recorded accurately, and the VAT control accounts reconciled.
 - 5.3 The Finance, Audit & Risk Committee are responsible for ensuring that internal control audits take place to provide assurance that the internal controls are robust. To support them in fulfilling this role The Board will commission an external provider to carry out an annual audit of the controls. The Finance, Audit & Risk Committee will ensure that an action plan is drawn up to address any weaknesses identified and will review this on a regular basis. All internal audit reports will be reviewed by The Board.
 - 5.4 The Finance, Audit & Risk Committee will approve the scope of the internal work to be conducted per financial year. This will include financial and non-financial controls.

- 5.5 The trust board must submit to the ESFA an annual summary of the internal scrutiny work that has been completed which includes areas reviewed, key findings, recommendations and conclusions by 31st December.
- 5.6 It is a legal requirement for the academy trust to prepare audited accounts. The Board will appoint the statutory auditors to audit the accounts and confirm that they are “true and fair”. The Headteacher and CFO will be required to ensure that up to date and accurate accounts are available and that year end processes are followed. The CFO and Headteacher will need to be available to support the statutory auditors in conducting their work.
- 5.7 The trustees will prepare an annual report that evaluates the performance of the external auditors, in accordance with the Academy Trust Handbook 2021, and makes a recommendation for the reappointment or dismissal of the auditors. Members are responsible for the appointment or removal of external auditors.

Separation of duties

- 5.8 It is the responsibility of the Headteacher to ensure that key financial duties are properly separated between individuals. Functions to be separated between staff will include:
- a) Execution – the placing of an order and receipt of goods and services, and the charging and receipt of a fee.
 - b) Authorisation – the authorisation of a transaction such as a purchase order and the payment.
 - c) Payment – the raising of cheques / BACS and cheque / BACS signatories.
 - d) Custody – the holding of goods and services.
 - e) Recording – the completion of the accounting records
 - f) Post transaction management checking – reviewing previous transactions to identify errors or intentional manipulation. HR & Finance Manager to check the non-salary transactions and the CFO to check the salary transactions periodically.

Accounting Arrangements

- 5.9 The financial transactions of the academy must be recorded in accordance with Academy Trusts approved accounting policies and recorded on the accounting system. All transactions input into the accounting system must be authorised in accordance with the procedures specified in this manual.
- 5.10 Entry to the accounting system is password restricted. Passwords should be changed annually.
- 5.11 Access to the component parts of the accounting system can be restricted and the CFO is responsible for determining access levels for all members of staff using the system.
- 5.12 The academy trust will have a standard chart of accounts. Requests to set up new ledger codes need to be made to the CFO. The HR & Finance Manager can maintain their own cost centres to suit their internal budget monitoring requirements.
- 5.13 The CFO is responsible for ensuring there is effective back up procedures for the accounting system.

5.14 The HR & Finance Manager is responsible for ensuring the following reconciliations are carried out on a monthly basis and account balances reviewed.

- Payroll control accounts
- Bank

5.15 The FO is responsible for ensuring the following reconciliations are carried out on a monthly basis and account balances reviewed.

- Debtor control accounts
- Creditor control accounts
- VAT control accounts
- Sundry creditors/accruals
- Sundry debtors/prepayment
- Fixed asset accounts
- Inventory
- Any other balance sheet accounts as appropriate

Any unusual or long-standing reconciling items should be brought to the attention of the Chief Finance Officer.

6.0 ASSETS AND INVENTORY

6.1 The FO should ensure that all items which have a useful life and value lasting more than one year and which is above the de minimis level set in the Trusts accounting policies (currently £1,000) are recorded on a fixed asset register and capitalised in the accounting system. The asset register should include the following information.

- asset description
- asset number
- serial number
- date of acquisition
- asset cost
- source of funding
- expected useful economic life
- depreciation
- current book value
- location
- supplier
- warranty information

Condition of the items should be reviewed annually, and adjustments made to the register if required.

Inventory

6.2 The academy trust will keep an inventory to

- Ensure proper physical control of school equipment.
- Provide a basis for insurance cover and claims if equipment is damaged or destroyed.
- Provide an up-to-date record of the equipment available for teaching purposes.
- Help the school plan its equipment replacement programme.

All portable items of equipment will be security marked with the name and postcode of the school. If the school chooses to use an invisible form of marking, then the item of equipment must carry a visible reference to the fact that the equipment has been security marked. Items not security marked are potentially not covered by insurance.

The following categories of inventory will be entered in the inventory register at the time of acquisition by the academy: -

- All items valued at £250 or more at the time of acquisition or purchase, either individually or as a set.
- Items below the value noted in (i) above but which are considered attractive and portable.
- Items considered by the Headteacher as being worthy of inclusion.
- Items hired to or leased by the school, that match any of the above criteria will be included but identified accordingly.

The inventory register will record the following information;

- Item description.
- Serial number or asset reference number.
- Date acquired.
- Acquisition cost.
- Asset location.
- If item has been security marked.
- Date of last physical check.

The FO is responsible for collating the inventory register.

All inventory items recorded in the register will be checked annually by the relevant departments and certified as correct. Any adjustments arising from the physical check must be authorised as laid down in 3.5 above. Evidence of the annual check taking place will be by date and signature of the person responsible for the check on the inventory sheets used for the check. These sheets will be retained on file for at least 24 months to provide an audit trail for changes made to the register as a result of the check.

All authorised disposal of school inventory must be recorded, showing the method of disposal and the authority for such action (see Section 3.5).

A separate 'Off Site Register' shall be kept for all items loaned to members of staff and pupils. In the event of any items not being on site when the inventory is checked, reference shall be made to this on the documentation used for the inventory check.

7.0 BANKING ARRANGEMENTS

- 7.1 All decisions with regard to the choice of banking service provider and subsequent banking arrangements will be made by The Board.
- 7.2 The Finance, Audit & Risk Committee must ensure that the academy accounts never become overdrawn. Any concerns regarding cash flow should be reported to the CFO.
- 7.3 The HR & Finance Manager is responsible for carrying out monthly bank statement reconciliations for all bank accounts within two weeks of receipt. Any un-reconciled payments older than six months, and unreconciled receipts older than one month, must be investigated and appropriate action taken.
- 7.4 Governors will wish to maximise income as far as possible and, where appropriate, a high interest or deposit account will be maintained, in addition to the normal current account. The Governing Body must approve any investment of funds outside interest bearing accounts at the school's bank.
- 7.5 Direct Debit or Standing Order payment arrangements must be authorised by two of the following authorised signatories and retained on file for reference.
- Headteacher
 - Director of Finance & Business
 - Deputy Headteacher / Assistant H/T's
 - HR & Finance Manager (including payroll related costs)

A current bank mandate must be retained on file and the mandated signatories should be consistent with those detailed above.

- 7.6 The academy may use BACS facilities to replace cheques. The principles and authorisation remain the same as for cheque payments.
- 7.7 BACS procedures and control are as follows:
- On initial set up the Finance Officer will contact the supplier for written confirmation of their bank details. This should be signed by 2 members of the company on their company headed paper, if possible.
 - On receipt of their bank details (or subsequent changes thereto) the Finance Officer will telephone the company to verify their bank details and will write/sign on the letter that this has been completed
 - The bank details are then input into the Financial Accounting System and are double checked and signed off by HR & Finance Manager. This signed evidence of independent checking is to be retained for audit purposes.
 - On a monthly basis an audit trail report will be generated to show any suppliers bank details that have changed - all changes on this report are to be checked off against bank details provided by the supplier and authorised by the Headteacher. This signed evidence is to be retained for audit purposes.

- All BACS payments generated on the accounting system, together with supporting invoices, will be signed individually by 2 approved signatures, in accordance with the bank mandate and the financial regulations, to confirm authorisation for payment.
- The BACS bureau procedures will be completed, ensuring the separation of duties are maintained. Payment advices are to be sent to each supplier.

7.8 When banking money received (either cash or cheques) the bank paying in slips will be completed in full, clearly showing the split between cash and cheques, and each cheque will be listed separately.

8.0 PURCHASING AND PAYMENT PROCEDURES

8.1 Budget holders will be responsible for requesting the purchase of items or services from their own budgets and in accordance with their delegated limits.

This will be done by the completion of an Internal Order Form which will be sent to the Finance Officer.

8.2 On receipt of an order form a check will be carried out to determine that the appropriate budget has sufficient funds to meet the order. Where sufficient budgeted funds are identified the Finance Officer will raise an official sequentially numbered Purchase Order to send to the supplier/contractor. Reference will be made as appropriate to the procurement standards laid down by the academy trust.

8.3 Orders are to be authorised in accordance with the 'Authorisation Limits' set out in the front of these Regulations and section 3.1 of these Regulations.

8.4 If an order is placed verbally due to urgency an order form should be used to ensure that a commitment is promptly raised on the financial accounting system. It is not acceptable to wait until the invoice/ delivery note is received before entering a commitment onto the financial accounting system.

8.5 All invoices received will be checked against the original order for accuracy (and delivery notes where appropriate) and entered promptly on the school's financial system.

8.6 The cheque signatories are any two from the following: -

- Headteacher
- Director of Finance & Business
- Deputy Headteacher / Assistant H/T's
- HR & Finance Manager (including payroll related costs)

8.7 The FO is designated to control cheques / BACS and must ensure that:

- a) A current bank mandate is kept on file and that the mandated signatories are consistent with those noted in 7.5 above.
- b) Cheque / BACS run / remittance reports are kept on file and are signed by at least one cheque signatory confirming an unbroken sequence of cheque numbers.
- c) Spoiled cheques are cancelled on the financial system, defaced and retained on file to confirm that all cheques have been accounted for.

- d) All blank cheques are securely stored and properly accounted for.
 - e) Blank cheques are not pre-signed
 - f) Where continuous cheque stationery is used, the approved format is complied with, in accordance with Trust guidance
 - g) All raised cheques / BACS are entered correctly on the financial accounting system.
 - h) Minimum remaining cheque levels are established with the bank.
- 8.8 The Headteacher must ensure that all prime financial records are retained for six financial years plus the current year and are stored in a secure and logical manner.
- 8.9 Cheques / BACS payments will be issued in accordance with the trading terms of the individual contractor or supplier since due regard must be taken of the 'Late Payment of Commercial Debts Regulations 2002'.
- 8.10 If discounts are available for prompt payment, then payments can be made immediately, having taken into account any loss of interest that might arise.
- 8.11 A copy of the computer-generated remittance advice relating to the cheque / BACS payment will be affixed to the original invoice.
- 8.12 Original invoices must be marked as paid to ensure duplicate payments are not made, together with details of the cheque number.
- 8.13 Copy invoices are not to be paid unless verified that payment has not previously been made. References back to the original order are to be made in every case. Once the checks have been made, the invoice should be signed to confirm this and endorsed "copy invoice not previously passed for payment".
- 8.14 Under no circumstances are payments to be paid against statements.
- 8.15 Where appropriate, adequate checks are to be made that the contractors employed for buildings work have Public Liability Insurance Cover, minimum value £5,000,000. It is the responsibility of the Headteacher to ensure that this is complied with.
- 8.16 For any order or purchase which is estimated to be less than £10,000 in value, for the supply of goods, materials or services, the budget holder must ensure value for money is obtained.

Orders and purchases between £10,001 and £25,000, will be subject to the receipt of at least 3 competitive quotations, documentary evidence of the various quotations must be obtained and attached to the purchase order and appropriately authorised. Where a quotation other than the lowest is accepted authorisation from the Finance, Audit & Risk Committee is required. The trust will check the DfE's National Deals for Schools when carrying out procurement activity.

In accordance with agreed procurement standards, approval of contracts over £25,000 will only be made after following the tendering procedure. The Board will oversee all tendering processes on behalf of the trust.

Internet Purchases

- 8.17 At all times, the same rigour of internal control must be placed on internet purchases as is normally applied to standard procurement with regard to separation of duties, authorisation controls and independent management checking.
- 8.18 The Finance Officer will be authorised to place online purchases. The internet order must be raised in the name of the school with the school's address, not to an individual.
- 8.19 Requests should be made to the Finance Officer from the budget holder in the normal manner (section 8.4), an official order should be raised on the financial accounting system and authorised as specified (section 8.4). Where possible the official order number should be quoted on the internet order as a cross reference.
- 8.20 It is the responsibility of the FO to ensure the internet is the most appropriate means for procurement.
- 8.21 The preferred method of payment for internet purchases will be the request of an invoice from the supplier, which can be paid via the school's normal payment route.
- 8.22 Payment by an individual's personal credit card should only be considered when the above options have been exhaustively attempted and failed. The correct authorisation procedure for purchases should still be adhered to (section 8.4), and the school retains the right to refuse to reimburse the individual if the school's procedures are not followed.
- 8.23 Reimbursement to individuals should be made in the normal manner upon production of an original invoice / receipt.
- 8.24 Supplier invoices, delivery notes and all relevant documentation should be obtained for all internet purchases and retained within the normal filing system (section 8.4). This is especially important if the school is to recover any VAT element.
- 8.25 All purchases should only be made from secure websites that the FO has gained reassurance are safe and free from fraudulent activity. The use of online auction websites is not recommended.

Purchase Cards

- 8.26 Purchase cards may be issued by the academy to key staff members to purchase items for the academy instead of using petty cash.
- Cards are issued in the academy's name
 - A card is held by the Headteacher and the Director of Finance & Business (DFB). The HR & Finance Manager and the Finance Officer are authorised to use cards for online payments as detailed above
 - Cards are kept in the academy safe when not in use
 - Card purchases are subject to the schools purchase/expenditure limits/procedures as detailed above
 - Personal use is not permitted
 - Prime documents will be retained for 6 years + current
 - Internet purchase limits are detailed above

- Monthly statements are authorised by the headteacher and DFB. Any purchase card in the name of the headteacher will be signed by the Chair of Finance, Audit & Risk Committee
- Misuse of purchase card by individuals must be reported to the Principal/Chair of Governors

TENDERING PROCEDURES

Introduction to Tendering

- 8.27 Approval of contracts over £25,000 will only be made following the academy's tendering procedure. If the academy undertakes a high-value or DfE-Qualifying purchase an Invitation to Tender will need to be issued as part of the process. An Invitation to Tender (ITT) is a pack of documents sent out to potential suppliers inviting them to submit a bid.
- 8.28 For more specialist or complex works and purchases, the academy may choose to appoint a professional third party to carry out the tender process on their behalf i.e. consultant, architect etc. If a third party is used, it is expected to apply these regulations with the same rigour and ensure that the principles of the Office of Government Commerce (OGC) Procurement Policy and Standards Framework are adhered to.

Forms of Tenders

- 8.29 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 DFB 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

- 8.30 Full consideration should be given to the objective of project, overall requirements, technical skills required, after sales service requirements and form of contract. 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

- 8.31 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.

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
- form of response.

8.32 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, warranties
- 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 Instructions

- 8.33 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

- 8.34 All tenders submitted should be opened at the same time and the tender details recorded. 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.

Two people should be present for the opening of tenders as follows:

Tenders will be opened by any two of:

The Headteacher, any Governor, the DFB. The two people will sign the record of details specified below.

All tenders will be opened at the same time with the name of the Contractor and quotation details recorded at the time of opening. In exceptional circumstances where there are short timescales e.g., due to a pandemic there may be insufficient time for this process, the project manager will agree the revised process with the Chair of Governors prior agreement.

Tendering Evaluation and Acceptance

- 8.35 The Board has set a minimum requirement of 3 tenders for fair evaluation purposes and in the interest of achieving best value. In any consideration of less than that number being received, The Board should consider whether this is sufficient and consider re tendering. Decisions to go ahead should fully document the justification.
- 8.36 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.
- 8.37 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.
- 8.38 Full records should be kept of all criteria used for evaluation and a report should be prepared for the Trust Board highlighting the relevant issues and recommending a decision.
- 8.39 Where required by the conditions attached to a specific grant from the DfE / ESFA, their approval must be obtained before the acceptance of a tender.

- 8.40 The accepted tender should normally be the one that is economically most advantageous in terms of best value to the academy that meets all the requirements. All parties should then be informed of the decision. Where a tender other than the lowest has been accepted, the reasons for its acceptance must be documented and reported to the Trust Board. All decisions made must be justified and recorded as such in the minutes of that meeting for future reference.
- 8.41 A copy of the tender documentation should be held on site for easy reference as required.
- 8.42 Acceptance of any tender will be confirmed to the contractor in writing and no work shall be started until this has been done.
- 8.43 Any contracts awarded will include a paragraph to the effect that any contractor will be prohibited from transferring or assigning, directly or indirectly, any portion of the contract to any other person or contractor, without the written permission of the Trust Board.

9.0 PETTY CASH

- 9.1 Minor items of expenditure can be paid for or reimbursed to staff through the school's own petty cash system. The amount to be held (imprest) for petty cash disbursements of £300 should be agreed by the Finance, Audit & Risk Committee.
- 9.2 Expenditure paid through petty cash should not exceed £25 on any one item, and not exceed £40 in any one week to one individual. Requests for amounts above this limit can only be authorised by the CFO.
- 9.4 All payments made must be supported by a VAT receipt for the goods purchased, along with an appropriate voucher signed by the member of staff receiving the cash.
- In order for the VAT to be recovered the VAT receipt needs to be scanned and attached to the journal entry to support in the completion of the central VAT return. In the absence of a scanned VAT receipt the expenditure needs to be coded as out of scope for VAT purpose
- 9.5 All petty cash will be kept in a locked box in the safe and the Finance Officer will be responsible for its security.
- 9.6 The amount of petty cash held in the school must be kept to a minimum and should never exceed £300 at any one time. The maximum amount of cash held in the school at any time must never exceed the insured limit for the safe as set by the school's insurance cover.
- 9.7 The Finance Officer will be responsible for the prompt entry of transactions onto the accounting system. The Finance Officer will be responsible for the monthly reconciliation of the petty cash. Expenditure plus cash in hand should equal the imprest. Documented reconciliations will be signed by CFO.

10.0 PAYROLL AND PERSONNEL PROCEDURES

- 10.1 All staff appointments, amendments to an employee's terms of employment and terminations of employment are to be made in accordance with the arrangements laid down in 3.9.
- 10.2 Neither the Headteacher nor the Deputy Headteacher can authorise amendments concerning their own pay and contract conditions. Changes to the Headteacher's pay and contract conditions must be authorised The Board.
- 10.3 The board of trustees must ensure its decisions around executive pay follow a robust evidence-based process and are reflective of an individual's role and responsibilities. As per the Academy Trust Handbook the following process should be followed;
- The procedure for determining executive pay is agreed by the board in advance and documented
 - Decisions around executive pay reflect independence and objective scrutiny and conflicts of interest are avoided
 - Factors in determining the level of pay are clear
 - Benchmarking has been carried out to ensure the level of pay reflects value for money and is relative to the public sector market
 - The process and rationale are all clearly documented.
- 10.4 The trust will publish 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.
- 10.5 The HR & Finance Manager has responsibility for checking and reconciling actual monthly payroll payments and deductions to those expected and committed.
- 10.6 Payments made each month to the Payroll Service Provider and payments made to outside staff agencies are to be debited against the relevant budgets and credited to the payroll control accounts. After the appropriate BACS transfers and the corresponding entries in the payroll control accounts and the school bank accounts have been made, any balance remaining in the payroll control accounts must be reconciled, and appropriate explanations documented. It is the responsibility of the HR & Finance Manager to ensure that this is done.
- 10.7 Each month the HR & Finance Manager will reconcile back to the bank statement all payments for salaries, BACS, and other salary related payments.
- 10.8 Each month the HR & Finance Manager will check a sample of the personnel records maintained by the school to the payments actually made by the Payroll Service Provider. It is expected that over the course of a year, every member of staff would have had his/her salary payment checked against personnel records at least once. It is the responsibility of the CFO to ensure this is done.
- 10.9 Copies of all individual notifications to the Payroll Service Provider will be filed by the HR & Finance Manager in the personal file of the staff member concerned and kept secure.

11.0 INCOME

General

- 11.1 It is the responsibility of the Finance Officer to ensure that all income due to the academy has been received, banked and that all income due to the academy is collected and reconciled to its financial accounting system.
- 11.2 All cash / cheque income received should be recorded immediately on the Academy's daily record books and entered onto the academy's financial accounting system. The collection record should contain the amount received, the name of the person / organisation making the payment, the date the payment is received, and the method, i.e. cash or cheque.
- 11.3 All income received by the academy should be banked at a minimum weekly and in full. The insurance policy cover for cash and cheques held on site must not be exceeded. However, if a high level of income is expected e.g. proceeds from a fete, the insurer must be informed to obtain additional short-term cover, and the income must then be banked as soon as is practicable.
- 11.4 Personal cheques should not be cashed.
- 11.5 When income is banked the collection record must be totalled in value in order to provide a clear cross reference to the value entered on the bank paying in slip. The bank paying in slip number should then be entered onto the income collection record to assist in providing a clear and simple audit trail.
- 11.6 When banking money received (either cash or cheques) the bank paying in slips will be completed in full, clearly showing the split between cash and cheques, and each cheque will be listed separately, either on the bank paying in slip, or the Cash Analysis Sheet.
- 11.7 Income received by the academy will be acknowledged to the payer by either i) issue of a receipt when the value of the payment exceeds £20 or, ii) by the collector signing an official collection record i.e. Residential Trip Payment Card. No category of income should be excluded from the issue of a receipt e.g. academy meals. Copies of receipts issued should be retained for future reference, e.g. to resolve a dispute over payment.

Custody

- 11.8 Where required, official, pre-numbered academy receipts should be issued for all cash and cheques received where no other formal documentation exists. All cash and cheques must be kept in the safe prior to banking.
- 11.9 Monies collected must be banked in their entirety (intact) in the appropriate bank account. A Finance Assistant is responsible for preparing reconciliations between the sums collected, the sums deposited at the bank and the sums posted to the accounting system and related system generated reports. The reconciliations must be prepared promptly after each banking and must be reviewed and certified by the Finance Officer.

Automated On- Line Payments

11.10 When setting up a contract with a new supplier for provision of an on-line payment system, consideration should be given to the following areas:

- i) Basis of fees payable to the company
- ii) Complete audit trail and facility of income reconciliation of totals received
- iii)) Reminder facilities to chase up overdue amounts

Any contract for the services of an online parental payment system Service Provider will be reviewed regularly to ensure that the academy is getting value for money and that the provider is giving an adequate service. A copy of the contract should be held by the academy.

12.0 RISK MANAGEMENT

12.1 The trust board has overall responsibility for risk management and must not delegate overall responsibility to a committee. The trust board must maintain a risk register. The Finance, Audit & Risk Committee will support the trust's risk management strategy by ensuring that the risk register is regularly maintained and submitted for monitoring to the board. It should identify significant risks and the member of staff responsible for managing it. A copy of the register should be presented to the Board regularly.

12.2 Where risks arise that threaten the reputation of the Academy Trust or the financial viability of the academy, they should be notified to The Board immediately.