



South East Cornwall Multi Academy Regional
Trust

Financial Regulations Policy and Procedures

Approved by the Trust Board on 23rd March 2017

This Policy will be reviewed and revised at least annually and in response to any audit or improvement recommendations

Contents

1. Introduction and purpose
2. Organisation
3. Financial Planning
4. Income
5. Cash Management
6. Accounting System
7. VAT
8. Purchasing and Payments
9. Payroll and Personnel Records
10. Relocation & Interview Expenses
11. Travel & Subsistence Expenses
12. Debt Recovery Procedures
13. Voluntary Private Fund
14. Fixed Assets
15. Data Management
16. Insurance
17. Key Inventory
18. Vehicles
19. Academy Companies Statement
20. Reserves and Investment
21. Counter Fraud, Theft and Corruption
22. Self-assessment of Governance and Management

Appendix A – Scheme of Delegation Grid

Appendix B – Forms of Tender

1 Introduction and purpose

Through the Funding Agreement with the Secretary of State for Education, Academies have increased autonomy. However, autonomy brings responsibility and the need for transparency. Operating as a charitable company limited by guarantee the Multi Academy Trust is required to produce an annual set of Financial Statements accompanied by a Trustees' Report.

The purpose of this policy is to ensure that the Multi Academy Trust develops and maintains systems of financial control which conform to the requirements of propriety, regularity and sound financial management. It is essential that these systems operate effectively to meet the requirements of the Academy Trust's Funding Agreement.

The Multi Academy Trust must comply with the principles of the financial control outlined in the guidance published by the DfE and the EFA (Education Funding Agency) which includes the Academies Financial Handbook. This policy expands on that and provides detailed information on the Multi Academy Trust's accounting procedures. It should be read by all staff involved with financial and resource systems to ensure accountability.

2 Organisation

The Multi Academy Trust has defined the responsibilities of each person involved in the administration of the Trust's finances to avoid the duplication or omission of functions and to provide a framework of accountability for the Trust Board and staff. All persons to whom authority has been delegated are expected to act in the best interests of the Multi Academy Trust and within the letter and spirit of the law.

2.1 Members, Directors and Local Governing Committees

Members, Directors and Local Governing Committees will manage their affairs in accordance with the high standards detailed in the *Seven Principles of Public Life*:

- **Selflessness** – Holders of public office should take decisions solely in terms of public interest.
- **Integrity** – Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their official duties.
- **Objectivity** – In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merits.
- **Accountability** – Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.
- **Openness** – Holders of public office should be as open as possible about all decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

- **Honesty** – Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.
- **Leadership** – Holders of public office should promote and support these principles by leadership and example.

As Directors of a company that spends Government money, the Directors will adhere to the Cabinet Office guidance on *Codes of Practice* for Board Members of Public Bodies:

- Observe the highest standards of **propriety** involving **impartiality, integrity** and **objectivity** in relation to the stewardship of public funds and the management of the bodies concerned.
- Maximise **value for money** through ensuring that services are delivered in the most **economical, efficient** and **effective** way, within available resources, and with independent validation of performance achieved wherever practicable. Value for money is not the lowest price; it is the optimum combination of whole life costs and quality to meet the user's requirement.
- Be accountable to parliament, users of services, individual citizens and staff for the activities of the bodies concerned, their stewardship of public funds and the extent to which key performance targets and objectives have been met.
- In accordance with Government policy on **openness** and **responsiveness**, comply fully with the Code of Practice on Access to Government Information.

2.2 Managing the Multi Academy Trust's Finances

The Trust Board has overall responsibility for administration of the Multi Academy Trust's finances. The main responsibilities of the Trust Board are as prescribed in the Funding Agreement between the academies within the Multi Academy Trust and the Secretary of State and include:

- Agreeing the long term financial objectives for the Multi Academy Trust
- Ensuring the grant from the EFA is used for the purposes intended
- Approving the annual budget and any material changes
- Approving changes to the personnel establishment
- Ensuring a Scheme of Delegation is in place
- Ensuring assets and allocated resources, including people, are well managed
- Ensuring accurate accounting records are maintained
- Ensuring the budget monitoring statements are a true and accurate record of income and expenditure
- Authorising the award of contracts/ tenders over the EU limits
- Ensuring the annual accounts are produced in accordance with the requirements of the Companies Act 2006, Charity SORP and the DfE guidance issued to academies
- Approving the annual accounts
- Submitting the annual Trustees' report

2.3 Chief Executive Officer

Appointed as Accounting Officer, the Chief Executive Officer has overall executive responsibility for the Multi Academy Trust and is responsible to the Trust Board for:

- Ensuring regularity and propriety
- Prudent and economic administration
- Avoidance of waste and extravagance
- Efficient and effective use of available resources
- The day to day organisation, staffing and management of the Multi Academy Trust

The Accounting Officer may formally delegate, or appoint others, to assist in these responsibilities.

The Accounting Officer has the duty to take action if the Trust Board or Chair is contemplating a course of action, which is considered to be novel, contentious, an infringement of propriety or regularity or a contravention of the *Seven Principles of Public Life* or the *Codes of Practice* for Board Members of Public Bodies. Objections should be put in writing to the Trust Board, details sent to the Company Secretary and the Multi Academy Trust's external auditors.

The Headteacher retains the responsibility for:

- Approving new staff appointments within the authorised establishments
- Approving changes within the authorised establishments' numbers, including regarding responsibility allowances
- Authorising orders and contracts
- Authorising payments
- Monitoring regular budget reports with the Business Manager/Client Manager and acting on any overspends or risks

The Chief Executive Officer is authorised to exceed delegated limits in times of emergency, to ensure safety, wellbeing and security, to ensure business continuity and where it is necessary to act quickly to avoid additional expense.

2.4 Chief Financial Officer

The Chief Financial Officer works in close collaboration with the Chief Executive Officer through whom he/she is responsible to the Trust Board. The main finance related responsibilities of the Chief Financial Officer are:

- The establishment and operation of a suitable accounting system
- Management of the Multi Academy Trust's financial position at a strategic and operational level
- Maintenance of effective systems of internal control
- Ensuring that the annual accounts are properly presented and adequately supported by the underlying books and records of the Multi Academy Trust

- Preparation of monthly management accounts
- Authorising orders and the award of contracts
- Submitting grant applications and reports to all relevant bodies as required

2.5 Business Manager/Client Manager

The Business Manager/Client Manager works in close collaboration with both the academy's Headteacher as well as the Chief Financial Officer through whom he/she is responsible to the Trust Board. The main finance related responsibilities of the Business Manager/Client Manager are:

- Day to day management of financial issues
- Management of the Multi Academy Trust's financial position at a strategic and operational level
- Maintenance of effective systems of internal control
- Preparation of monthly management accounts
- Authorising orders and the award of contracts
- Authorising payments where appropriate
- Submitting grant applications and reports to all relevant bodies as required

The Business Manager and Chief Financial Officer can assume the financial responsibilities of delegated budget holders during their absence to ensure business continuity and the effective use of allocated resources.

2.6 The Audit Committee

The Audit Committee supports internal audit and is appointed by the Trust Board to provide it with an independent assurance that:

- The financial responsibilities of the Trust Board are being properly discharged
- Resources are being managed in an efficient, economical and effective manner
- Sound systems of internal financial control are being maintained
- Financial considerations are fully taken into account in reaching decisions

The programme of checks will be agreed with the Trust Board in line with any identified risks and guidelines set out within the Academies Financial Handbook. These checks are delegated to external auditors and a report of the findings from each visit will be provided to the Audit Committee and then the Trust Board.

2.7 Appointed Auditors

The Multi Academy Trust will be required to submit annual audited Financial Statements to satisfy the requirements of the Secretary of State, company law and charity accounting. The appointed auditors are currently Bishop Fleming.

2.8 Other Staff

Other members of staff, primarily the Assistant Business Managers, Finance Officers, Finance Assistants, Primary School Secretaries and Budget Holders, will have some specific financial responsibilities and these are detailed in the Appendices.

All Directors, Governors, staff and volunteers are responsible for the security of Academy property, avoiding loss or damage, for ensuring economy and efficiency and avoiding waste and extravagance in the use of resources and for the conformity with the requirements of the Trust's financial procedures.

2.9 Register of Interests

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 Directors, Governors and staff with significant financial or spending powers are required to declare any financial interest they have in companies or individuals from whom the academy may purchase goods or services. The register is open to public inspection.

The register should include all business interests such as directorships, share holding or other appointments of influence within a business or organisation which may have dealings with the Multi Academy Trust.

The disclosure should also include business interests of relatives such as a parent or spouse or business partner where influence could be exerted over a Director, Governor or a member of staff by that person.

The existence of a register of business interests does not detract from the duties of Directors, Governors and staff to declare interests whenever they are relevant to matters being discussed by the Trust Board, a Committee or other meeting. Where an interest has been declared, Directors, Governors and staff should not attend that part of any meeting.

3 Financial Planning

3.1 Five Year Budget Plan

The budget is complementary to the Whole School Development Plan (for all academies within the Multi Academy Trust) in the short and long term and is crucial in the planning and preparation of the budget. The Business Manager/Client Manager is responsible for working with the Headteacher, Chief Financial Officer and others to prepare a five year budget plan for consideration by the Trust Board. The budgets must be approved prior to their submission to

the DfE by the appropriate deadlines. The Chief Financial Officer is responsible for establishing a timetable which allows sufficient time for the approval process and ensures the submission date is met.

The budget will reflect a best estimate of the resources available to the Multi Academy Trust for the forthcoming year and will detail how those resources are to be utilised. There will be a clear link between the Whole School Development Plans' objectives and the budgeted utilisation of resources.

The budgetary planning process will incorporate the following elements:

- Forecasts of the likely number of students to estimate the amount of DfE funding receivable.
- Review of other income sources available to assess likely level of receipts.
- Review of past performance against budgets to promote an understanding of the Multi Academy Trust's cost base.
- Identification of potential efficiency savings.
- Review of the Multi Academy Trust's main expenditure headings and any expected variations in cost, ie; pay increases, inflation and other anticipated changes.

Once ratified, the budget should be communicated to all staff with responsibility for specific budgets so that everyone is aware of the overall budgetary constraints.

3.2 Budget Management, Monitoring and Review

The Business Manager/Client Manager will prepare monthly management accounts reports to show actual income and expenditure against budget. This will be on a summary level for the Headteacher, Chief Financial Officer, Chief Executive Officer and Trust Board but more detailed monthly reports will be distributed to delegated budget holders.

The monitoring process should be effective and timely in highlighting variances in the actual against budget so that differences can be investigated and action taken where appropriate. Any potential overspend against budget must in the first instance be discussed with the Business Manager/Client Manager.

The Chief Financial Officer and the Trust Board will continually monitor the quality of the financial information presented to ensure that what is provided remains appropriate, particularly in terms of the timing, level of details and narrative.

3.3 Capital Budget

The Trust will receive capital funding for the Multi Academy Trust from the SCA, (School Condition Allocation) fund. This will be distributed throughout the Trust based on priority of need. Each Academy will also receive a small allowance under Devolved Formula Capital. Major capital investments can be funded through reserves, DfE capital grants, SCA or charitable donations. In most cases, the funds will be specific to the project.

4 **Income**

The main sources of income for the Multi Academy Trust are the funding from the EFA and other outside agencies and the Local Authority. The receipt of these monies is monitored directly by the Business Manager/Client Manager who is responsible for ensuring that all monies due to the Multi Academy Trust are collected and correctly accounted for within the finance system.

The Multi Academy Trust also obtains income from students, mainly for voluntary contributions towards educational trips and activities, and from the public, mainly for lettings.

To comply with money laundering regulations, the Multi Academy Trust will not accept any payment in cash over £5,000.

All arrangements for dealing with income should incorporate suitable controls designed to ensure its propriety ie:-

- Adequate records are maintained to substantiate all income transactions.
- Receipts are issued for any cash income received.
- All income received at the academies is held securely and is banked promptly.
- All income transactions (cash, cheque and online payments) are recorded promptly and accurately in the Multi Academy Trust's PS Financials system.
- Invoices are raised in respect of all credit income and all such income is collected in accordance with approved instructions.

4.1 Trips/Activities

All trips and activities, including school productions must be authorised and the objectives must be clearly stated in order to apply the Multi Academy Trust's Charging Policy. Educational curriculum trips/activities only require a voluntary contribution.

An organiser/ leader must be appointed for each trip who must work with the Finance staff to prepare a costing breakdown for the trip to show the trip can cover its costs and not intend to make a profit. The trip organiser must advise the Finance staff of which students are participating in the trip in order that payment contributions may be recorded and collected in full.

The Finance staff will maintain an up to date record of each trip showing the amount paid and the amount outstanding. A report will be sent to the trip organiser on a regular basis and any outstanding contributions chased when necessary.

4.2 Lettings

The policy for lettings and charging of premises is contained in a separate document. The policy will be reviewed annually and approved by the Local Governing Committee and Trust Board.

Lettings tariffs are regularly reviewed and must have due regard for Health and Safety legislation and the need to cover the full cost of the letting (eg energy, caretaking/cleaning and maintenance costs). Free and concessionary lettings should be approved by either Directors and/or the Headteacher and documented as with all lettings.

The Site Manager, Community Sport and Development Officer or other designated person are responsible for lettings of facilities and maintaining appropriate records for these bookings. Where necessary he/she will seek approval of the Headteacher for new bookings.

They will also advise the Finance Staff of all lettings to ensure relevant invoices are raised to each organisation and recorded within the Multi Academy Trust's PS Financials system. All payments received are promptly recorded against these numbered invoices.

4.3 Custody

Official, pre-numbered receipts should be issued for all cash and cheques received where no other formal documentation exists. All monies collected must be kept in the schools' safes prior to banking. Banking will take place on a regular basis or more frequently if the sums collected exceed the insurance limits on the safes.

Monies collected must be banked in their entirety in the appropriate bank account. The Trust's Finance teams are responsible for preparing reconciliations between the sums collected, the sums deposited at the bank and the sums to be posted to the finance system. The reconciliations must be prepared promptly after each banking.

4.4 Waivers and Discounts

Waivers of income due or authorisation of discounts allowed require the same scrutiny, consideration and formal decision as any requirement to spend Academy money. Sometimes there are sound business reasons for not charging, e.g. to achieve wider policy objectives such as community cohesion, or for giving discounts, e.g. to secure some income rather than no income where our rates are simply unaffordable to the user. For discounts, the expected minimum recovery rate is the extra costs of providing the activity. Waivers and discounts can therefore only be approved by the Headteacher or Business Manager/Client Manager.

4.5 Gifts and Hospitality

Ordinarily gifts from suppliers should be declined, unless they are of negligible value (eg. branded stationery). However, any gifts or hospitality in excess of £10 should be reported to the Business Manager/Client Manager in order to protect the individual receiving the gift. This is particularly important where the person receiving the gift is a Director, Governor or budget

holder and has the ability to influence purchasing decisions or regularly receives reimbursement from the Multi Academy Trust for items other than travel expenses.

On an annual basis, staff members are required to complete a register of gifts and hospitality form. This will detail any acceptance of gifts, hospitality, awards, prizes or any other benefit which might be seen to compromise their personal judgement or integrity.

Gifts may be given but only as a reward to students or staff but not exceeding £50.

5 Cash Management

5.1 Bank Accounts

The opening of all bank accounts must be authorised by the Trust Board which must set out the arrangements covering the operation of the accounts. The account must be in the name of the Trust and/or school making the request.

The signatory limits are as follows:-

A – C Dickson, B Lee, L Griffin, K Littledyke, H Jenkins, A Lingard, E Best, T Gray, V Lovell

Up to and including £1,000 = 1 A

Over £1,000 = 2 A

Inter account transfers = J Lumbard and 1A

Note – For payments over £20,000, the Chief Executive Officer will countersign the expenditure in addition to the normal signatories. When a BACS payment is then authorised an email will be sent from the Chief Financial Officer to the Finance Director to alert him/her of the payment and to provide details.

5.2 Deposits

Particulars of any deposit must be entered on a paying-in slip, counterfoil or listing in a supporting receipt book. The details will include:

- The amount of the deposit
- Receipt number or the name of the debtor
- Details of reason for payment

5.3 Payments and withdrawals

All BACS, cheques or other instruments authorising withdrawal from the Multi Academy Trust's bank accounts must bear the signatures as set out above.

Authorised signatories must not solely sign a cheque or authorise BACS relating to goods or services for which they have also authorised the expenditure.

5.4 Bank Reconciliations

The Central Business Unit will ensure bank statements are received regularly and that reconciliations are performed at least on a monthly basis. Reconciliation procedures will ensure that:

- All bank accounts are reconciled to the PS Financials finance system.
- Reconciliations are prepared by a member of the Central Business Unit.
- All bank reconciliations are then signed off by the Chief Financial Officer who is not a bank signatory.

5.5 Petty Cash

Petty Cash is administered by the Trust's Finance teams and is kept in a locked box in the school safe. Budget holders may authorise the use of petty cash for items of expenditure of up to £100. Payments of petty cash will not be made without receipts and signed authorisation by the budget holder. VAT receipts must be obtained for purchases where appropriate. The Trust's Finance teams are responsible for entering all transactions into the petty cash records which will be reconciled on at least a termly basis then reviewed by the Business Manager/Client Manager.

5.6 Cash and Cheques in Stowage

The maximum holdings in the safes at all schools are £3,000 cash and £40,000 cheques. Up to £1,000 may be held in a lockable container within an Academy office.

5.7 Cash and Cheques in Transit

Appropriate safeguarding of individuals and cash/cheques must be taken when monies are in transit. The maximum cash to be carried outside the academies is £3,000 and £40,000 for cheques.

6 Accounting System

All the financial transactions of the Multi Academy Trust must be recorded on its PS Financials accounting system. PS Financials is operated by the Finance team and includes the following key elements:

- Income
- Purchasing
- Payroll
- Bank accounts

Detailed information on the specific operation of PS Financials can be found in the user manuals held by the Central Business Unit.

6.1 Administration

There will be a clear audit trail for all financial transactions from the original documentation to accounting records. Financial records will be stored for seven years in accordance with the

Companies Act. Only authorised staff will be permitted access to the accounting records, which should be securely retained when not in use.

Authorisation and supervisory controls will ensure transactions are properly recorded or that errors are identified. All records will be protected against unauthorised modifications, destruction, disclosure or loss whether by accident or intention.

6.2 Access Rights

The Chief Financial Officer is responsible for setting access levels for all members of staff using the PS Financials system. These are defined for each user with a unique ID and password.

6.3 Back-up Procedures

The finance system is a cloud based system and will be protected by robust back up procedures.

7 VAT

The Multi Academy Trust is not currently registered for VAT. VAT reclaims can be made under simplified arrangements with HMRC on a VAT 126 form. For cashflow purposes the Multi Academy Trust reclaims VAT on a monthly basis.

8 Purchasing and Payments

The Multi Academy Trust will achieve best value for money for all purchases. As the majority of its purchases will be paid for with public monies it needs to maintain the integrity of the monies 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 Multi Academy Trust.
- **Accountability:** the Multi Academy Trust is publicly accountable for its expenditure and the conduct of its affairs.
- **Fairness:** that all those engaged by the Multi Academy Trust are dealt with on a fair and equitable basis.

The Chief Financial Officer will ensure that there is a clear separation of duties within the Finance team.

8.1 Orders for Goods and Services

Any company with which the Multi Academy Trust wishes to place orders must first complete a supplier information form to provide the Trust with all relevant information including payment details which will then be used to set up that supplier on the finance system. Official purchase orders will be raised using the Trust's finance system following authorisation by a relevant budget holder. The purchase order must then be authorised by the Chief Financial Officer before the order is placed with the company.

8.2 Procurement Arrangements

All orders are subject to the rules concerning quotes and tenders listed below:-

Orders below £1,000 – consideration should be given to alternative suppliers and evidence attached to purchase orders.

Orders of £1,000 but less than £5,000 – At least two written/ verbal quotations should be obtained for all orders to identify best value. Any written details of quotations should be attached to the purchase order for audit purposes.

Orders of £5,000 but less than £10,000 - At least three written/ verbal quotations should be obtained for all orders to identify best value. Any written details of quotations should be attached to the purchase order for audit purposes.

Orders of £10,000 but less than £50,000 – A minimum of three formal quotations to be obtained in writing based on a written specification. All evidence of the quotations should be attached to the purchase order.

On occasions when it is not possible to obtain the number of quotations as detailed above, the process to follow is shown in appendix B.

Orders over £50,000 but less than EU Threshold – (EU Threshold as at 1st January 2014: £172,514 supplies and services; £4,322,012 works)

Goods/services ordered with a value over £50,000, or for a series of contracts which exceed £50,000, must be subject to formal tendering procedures as detailed below. All paperwork relating to the tender must be retained by the Business Manager/Client Manager.

Orders over EU Threshold – Purchases over the EU Thresholds are by law subject to EU Public Procurement Directives for the advertising and the Award of Contracts.

8.3 Forms of Tenders and Formal Tender Process

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

8.4 Payments

Invoices will be paid when the budget holder has shown approval that goods/ services have been received and are of the quality expected. Any discrepancies must be notified to the Finance staff for appropriate action to be taken. Invoices sent electronically by email are acceptable.

Wherever possible payments will be made by BACS, but cheques may be issued if this is not an option.

The Finance staff will ensure that the required number of signatures are obtained to authorise a BACS payment and are on any cheques issued. All cheque stationery should be recorded and stored in a locked cupboard.

All cheques and cash are to be stored in the safes and are not to be accessible to any bank signatory. Similarly, electronic payment input screens, such as BACS, should not be accessible to authorised bank signatories.

8.5 Payments to Self Employed Individuals

Payments can be made to individuals who are genuinely self-employed on production of an invoice. An enquiry must be carried out on the individual on the HMRC Employment Status Indicator Tool and a reference number obtained.

8.6 Leases

The Multi Academy Trust may enter into operating lease agreements where these provide an affordable option over outright purchase. Finance leases are not permitted without express permission of the Secretary of State.

9 Payroll and Personnel Records

9.1 Staff appointments and changes

The Trust Board will have approved a personnel establishment for each Academy within the Multi Academy Trust. The Headteacher has the authority to appoint staff within the authorised establishment and to make changes within the overall cost, such as regarding responsibility allowances and deletions. The exception would be the appointment of Deputy Heads and members of the Senior Leadership Teams which would require consultation with the Chief Executive Officer and the Trust Board. The Headteacher and HR Officers will maintain personnel files for all members of staff, including contracts of employment.

All personnel changes must be notified, in writing, to the Chief Financial Officer to enable budget monitoring of the salaries budget.

9.2 Payroll Administration

Payroll is outsourced to Cornwall Council Payroll Services.

All payroll transactions relating to Multi Academy Trust staff, permanent or casual, will be processed through the payroll system. Payments for employment will not be made to staff through any other mechanism, other than emergency payments by BACS where payroll timings would impact adversely on the employee. In such cases the amount to be paid will be agreed with the payroll team and recovered the following month through the payroll process.

All personnel files are stored in a lockable cabinet. Only the Headteachers, the HR Officers and Business Managers may have full access to staff files but individuals can request to see their own files in line with data protection policies.

The HR Officers and the relevant designated staff are responsible for keeping the staff files and personnel database up to date via SIMS.

9.3 Payments and Monitoring of the Payroll

Each section head must complete the relevant paperwork, when necessary, for all staff in the section in the case of sickness and other absences during the month along with any overtime payments and any new appointments or terminations. The paperwork must be authorised by the nominated budget holder. Authorised paperwork should be sent to the HR Officers or Finance Staff who then input the data on to the payroll spreadsheets for submission to the payroll provider in accordance with their monthly timetable.

After the payroll has been processed by the payroll provider reports are sent to the Chief Financial Officer who reviews all records against those submitted by the HR Officers or Finance Staff. If correct, the records will be authorised by the Chief Financial Officer to allow the payroll provider to release the payments to staff.

Monthly salary payments are made by BACS. The payroll provider 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 a letter of authority which are checked against the monthly reports from the payroll provider and authorised for payment by the Chief Financial Officer by the due date.

After the payroll has been processed the nominal ledger within the accounting system will be updated. Postings will be made both to the salary control account and to individual cost centres. The Chief Financial Officer will review the salary control account each month to ensure the correct amount has been posted, individual cost centres have been correctly updated and to identify any amounts left in the control account.

On a half termly basis the Chief Financial Officer and the HR Officers or Finance Staff will check each member of staff to ensure that the gross pay per the payroll system agrees to the contract of employment held on SIMS.

10 Relocation and Interview Expenses

Relocation expenses to new members of staff are not paid.

Interview expenses are paid at the discretion of the interview panel and will only be settled on the production of valid receipts and invoices. Travel expenses, if approved, will be calculated using the Multi Academy Trust's usual mileage rate of 40p per mile.

11 Travel and Subsistence Expenses

Travel and Subsistence expenses are certified by the member of the academies Senior Leadership Teams (or Line Manager) permitting the travel and then authorised for payment by the Business Manager/ Client Manager. The Chief Executive Officer's travel claims are authorised for payment by the Chair of the Trust Board.

In accordance with HM Revenue and Customs regulations all claims must be supported by a fuel receipt purchased during the month for which the mileage claim relates.

Normal home to work mileage must be excluded from any claim for travel where the start and/or finish is the claimant's home.

Directors and Governors are able to claim travel expenses. These should be authorised by the Chair of the Trust Board, if the claimant is the Chair of the Trust Board then the claim should be authorised by the Chief Executive Officer.

Directors, Governors and staff will be paid for expenses directly from the Multi Academy Trust at a rate of 40p per mile with an additional 5p per mile if also carrying a passenger.

12 Debt Recovery Procedures

Debt recovery becomes necessary when the customer fails to pay to the agreed terms set out in the original contract.

The Finance Team will pursue outstanding debts as follows:-

- If payment has not been received 30 days after invoice a first reminder will be sent requesting payment.
- If payment is not forthcoming after a further 30 days, a second reminder will be sent with a notification of further action to recover the debt if payment is not received within 7 days.
- If payment is still not forthcoming, a third reminder will be sent with a notification of legal action through the Small Claims Court if payment is not received within 7 days.
- If payment is still not forthcoming the matter is reported to the Finance Committee to seek approval for proceeding with legal action through the Small Claims Court.
- OR the current aged debtors report together with details of any debts outstanding and requests for debts to be written off will be provided to the Finance Committee.

Debt Recovery Code of Practice

- The Trust does not use oppressive and intrusive collection methods.
- The Trust does not act in a manner intended to embarrass the debtor.
- The Trust is circumspect and discreet when attempting to contact the debtor, whether by telephone, letter, or by personal visit.
- The Trust ensures that all attempted contact with the debtors is made at reasonable times and at reasonable intervals.
- Unless instructed otherwise by the debtor, the Trust does not discuss with or disclose to neighbours, relatives or employers a consumer's indebtedness.
- The Trust does not use improper means to obtain the telephone number or the address of the debtor.
- The Trust does not pressure debtors to sell property or raise funds by further borrowing.

- The Trust does not falsely imply that criminal proceedings will be brought nor that civil action has been instituted in default of payment.

13 Schools' Private Fund

The Schools' Private Fund is a Multi Academy Trust resource that is not part of the Multi Academy Trust's delegated budget from the EFA. The funds act as a holding account for voluntary contributions for trips and charity items. The funds are appropriately safeguarded and controlled by the same policies and procedures as the rest of the Multi Academy Trust's income and expenditure. The funds have separate bank accounts.

14 Fixed Assets

All items purchased with a value over £1,000, the Multi Academy Trust's capitalisation limit, must be entered in the accounting asset register and recorded on to either the School Asset Manager system or an alternative that is in place.

The asset register should include the following information:

- Asset description
- Asset number
- Serial number
- Date of acquisition
- Asset cost
- Expected useful economic life
- Depreciation
- Current book value

The asset register helps:

- Ensure that staff take responsibility for the safe custody of assets
- Enable independent checks on the safe custody of assets, as a deterrent against theft or misuse
- Manage the effective utilisation of assets and to plan for their replacement
- External auditors draw conclusions on the annual accounts and the Multi Academy Trust's financial system.
- Support insurance claims in the event of fire, theft, vandalism or other disasters.

Asset Security

Stores and equipment must be secured by means of physical and other security devices.

All items in the register should be permanently and visibly marked as the Multi Academy Trust's property and there will be a regular spot check. Any discrepancies arising as a result of the check will be investigated promptly and, where significant, be reported to the Trust Board by the Chief

Financial Officer. Inventories of Multi Academy Trust property will be kept up to date and reviewed regularly.

Asset Disposal

Items which are to be disposed of by sale or destruction must be authorised for disposal by either the Chief Financial Officer or the Business Manager. The Multi Academy Trust must seek approval of the DfE in writing if it proposes to dispose of an asset for which a capital grant in excess of £20,000 was paid. The Multi Academy Trust is expected to reinvest the proceeds from all asset sales for which capital grant was paid in to other Multi Academy Trust assets. If the sale proceeds are not reinvested then the Multi Academy Trust must repay to the DfE a proportion of the sale proceeds.

Loan of Assets

Items of Multi Academy Trust property must not be removed from Academy premises without the authority of the appropriate Line Manager and the Business Manager. A record of the loan must be recorded on the School Asset Manager System or an alternative that is in place and booked back in on its return. The person borrowing the asset will be responsible for returning it to the Academy in the same condition and must ensure that they have sufficient insurance cover to address any damage or loss of the asset.

Depreciation

The Multi Academy Trust will depreciate fixed assets in line with recognised accounting standards, Academy best practice and DfE guidelines. Depreciation rules and revisions will be approved by the Trust Board.

Depreciation is provided for at the following annual rates in order to write off each asset over its estimated useful economic life and to reflect the resultant resource consumption in the Multi Academy Trust's accounts:

- Fixtures, fittings and general equipment – 20% straight line
- Computer equipment – 33.33% straight line
- Long Term Leasehold Property – 2%/4% straight line
- Motor vehicles – 25% - reducing balance

Depreciation is not charged on assets under construction until they are brought into use.

15 Data Management

Academy data is a key resource, whether held in paper or electronic format. All data is processed in accordance to the Data Protection Act.

Physical protective measures will be in place for hard copy information relative to the classification of the data.

Systems are in place to protect key computer and electronic data; control features include:

- Regular back up procedures
- Passwords
- Disaster recovery plans

16 Insurance

The Multi Academy Trust purchases adequate insurance to protect assets, activities and outcomes. The insurance policy terms and levels of cover are reviewed annually by the Chief Financial Officer. In the case of a claim the Business Manager/Client Manager will notify the Central Business Unit who will in turn contact the Trust's insurers without delay to ensure the matter is dealt with in a timely and appropriate manner. This will result in the efficient reimbursement of monies.

17 Keys and Key Code Inventory

The key inventory is the responsibility of the Site Manager or relevant designated person to maintain and will be kept up to date at all times. It is the responsibility of staff to report all lost and stolen keys, or compromised key codes, to enable new security measures to be put in place and for the key inventory to be updated.

18 Vehicles

Staff must ensure that only persons that are suitably qualified drive the Trust's vehicles. The Trust's vehicles can only be used for business in relation to the Trust's purposes (see Articles of Association). This includes wider community use for which donations are acceptable. However, the vehicles are not available for general hire.

Prior to use all vehicles are to be checked in line with the Trust's procedures; failure to do so may lead to disciplinary action - see Staff Handbooks for booking and operating procedures. The name of the driver, start point, end point and mileage for each journey is to be recorded in the vehicle log.

All damage is to be reported to the Site Manager or relevant designated person.

19 Academy Companies Statement

The Academy will not form any companies, subsidiaries or joint ventures without the approval of the Trust Board.

20 Reserves and Investment

The Trust has separate policies containing further details.

21 Counter Fraud, Theft and Corruption

The Trust takes a firm zero tolerance approach to all instances of fraud, theft or corruption. Through its systems, checks and controls, the Trust aims to prevent theft, fraud and corruption, but will act as necessary to identify suspected instances and irregularities and will take appropriate action against those responsible. Full details can be found in the Trust's Counter Fraud, Theft and Corruption Policy.

22 Self-Assessment of Governance and Management

The Trust Board and the Chief Financial Officer will ensure that a self-assessment is undertaken annually in order to provide the EFA with assurance on the adequacy of the Trust's arrangements for financial management and governance. The self-assessment will provide assurance to the Trust's Accounting Officer and Audit Committee that conditions of funding are being met, and that appropriate systems of control are in place.