The White Hills Park Trust

A Culture of Excellence

Financial Regulations

Version control

Scope:	**Applicable to all Trust Schools**
Review date:	**Spring term 2026**
Statutory or non-statutory:	**Non Statutory**
Author/Reviewer:	**Julia Gibbs/Chief Financial Officer**

Introduction

This policy applies to all Trust schools/academies.

Equalities

The Trust and its member schools/academies recognise their legal responsibilities under the Equality Act 2010 and this policy aims to ensure that all employees are treated with equality and fairness regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality and ethnic or national origin), religion or belief, sex and sexual orientation.

Version Control

Version	Author	Date	Changes
0.1	J Gibbs	May 2023	Updated limits in authorisation level tables
0.2	J Gibbs	April 2025	ESFA replaced with DfE throughout Updated for ATH updates ref 25-26
0.3	J Gibbs	Feb 2026	See table below – Approved at A&R 3rd March 26

Changes February 2026

Page ref	Change
P10	Added in reference to Jnls testing which is now completed monthly
P11	Added in a reference to the Strategic plan as budget setting framework
P12	Added in references to benchmarking, costed staffing list and budget assumptions in the bullet points under "the budgetary planning process"
P13	Removed the parag on "balancing the budget" as this is covered by the bullet points on planning process on P12 and does not add more value
P13	Under "Academy level monitoring and review" – remove reference to "inform the financial monitoring and review process with the LGB" - the main focus on budget monitoring and review is with the Headteacher
P13	Under "Academy level monitoring and review – added in yellow highlighted section to reference HT working with CFO in the event of divergence from plan. Also confirmed that the budget is a working document to revise through the year. Added in reference to the finance system for all finance leads in school – confirming they have access to budget v actual data
P14	Under payroll – added in restrictions around recruitment into roles which were not part of the agreed budget at the start of the year, with a link to the financial SoD in Appendix A
P15-16	Updated the whole section on severance payments to the 25-26 version of the ATH, and added in reference to the new ATH section on confidentiality clauses
P19	Taken out the section on non-competitive purchases, as this is now covered off in the separate procurement section
P21	Removed reference to cheques as a method of payment
P22-25	Complete update to Procurement section to better reflect the requirements of the Procurement Act 2023
P25	Taken out the section on contract extensions – covered in purchasing and preferred route would anyway be new contract tender/quote process
P27	Added in exceptions to reporting guidance per the ATH 25-26 on related party transactions
P29	Removed the section on "professional services" – too detailed an example for this policy
P31	Added more detail in on catering income and how it is collected through Vericool
P34	Added in clarification that the "one bank account" refers to the operational bank account.
P34	Added in process controls over the "funding and creaming" arrangement (overnight deposit) set up with Lloyds in January
P35	Added in a new section on Internal Scrutiny as this is not specifically covered in any other policy, and then links to the risk mgt policy more clearly

Contents

1 Introduction

The purpose of this manual is to ensure that the Academy Trust and each of its constituent academies maintains and develops systems of financial control which conform to the requirements both of propriety and of good financial management. It is essential that these systems operate properly to meet the requirements of our Multi Academy Trust Master Funding Agreement and the individual school Supplemental Agreements with the Secretary of State for Education.

Academy Trusts are companies limited by guarantee and, under the terms of the Academies Act2010, exempt charities. They must comply with the requirements of the Charities Act 2011 and Companies Act 2006.

Each school within the Academy Trust, and the central office, must comply with the principles of financial control outlined in the Academy Trust Handbook and any additional relevant Guidance published by the Department for Education (DfE). This policy expands on that and provides detailed information on the Academy Trust's accounting procedures and shall be read by all staff with financial responsibilities.

Compliance with the policy is mandatory for all members, Directors, Governors, staff and volunteers and any contravention of procedures must be brought to the attention, in the first instance, of the Accounting Officer. For The White Hills Park Trust this office resides with the Chief Executive Officer (CEO)

All staff are aware of the Trust's whistleblowing policy and to whom they should report any concerns regarding malpractice and wrongdoing. Any suspected financial irregularity will be reported to the DfE.

2 Organisation

The White Hills Park Trust (WHPT) is a Multi-Academy Trust. The Trust is a company limited by guarantee with charitable status and all academies within the White Hills Park Trust are governed by one trust (the members) and a Board of Trustees (Directors).

The Trustees must establish separate committees to be known as Local Governing Bodies for each school and will ensure that, wherever possible, each Local Governing Body shall include at least 2 elected representatives of the parents of pupils attending the relevant schools.

The Academy Trust has defined the responsibilities of each person involved in the administration of the Academy Trust finances to avoid the duplication or omission of functions and to provide a framework of accountability for the Board and staff.

Members

The Members' main responsibilities include;

- The appointment of external auditors
- Receiving the audited financial statements
- Appointment of Trustees if necessary

The Board of Trustees

The Board has overall responsibility for the administration of the Academy's finances. The main financial responsibilities of the Board include:

- Ensuring that the Trust's funds are used in accordance with the law, the Articles of Association, the funding agreement and the Academy Trust Handbook;
- Appointment of an appropriate Accounting Officer;
- Appointment of a Chief Executive Officer ("CEO") and Chief Finance Officer ("CFO");
- Appointment of Audit and Risk Committee and approval of its terms of reference;
- Identifying the skills and experience that it needs and address any gaps through recruitment and/or induction, training and other development activities;
- Ensuring economy, efficiency and effectiveness in the use of the funds (Value for Money);
- Providing details of the Academy Trust's governance arrangements in the governance statement within the annual accounts and on the website.
- Understanding and complying with their statutory duties to avoid conflicts of interest and to declare an interest in proposed transaction or arrangements
- Approval of the Trust Scheme of Delegation
- Approval of the annual budget;
- Ensuring there is sufficient rigour and scrutiny in the budget management process;
- Creating a pay committee that will approve salary progression for teaching staff in line with the new performance related pay and the Trust's own pay policy.
- Approval of tenders/contracts over the Find a Tender limit

The Audit and Risk Committee

The Audit and Risk Committee is a committee of the Board. This committee exercises the powers and duties of the Trust Board in respect of the financial administration of the Academies, except for those items specifically reserved for the Trust Board and those delegated to the Local Governing Bodies, Chief Executive Officer, Academy Headteachers, Chief Financial Officer and other staff. The Audit and Risk Committee meets at least twice a term, but more frequent meetings will be arranged if necessary and business conducted only if quorate.

The responsibilities of the Audit and Risk Committee are detailed in the written terms of reference which have been authorised by the Board. The main responsibilities are to:

- Consider the budget of the Trust and each academy within it, in advance of the financial year involved and draw any matters of significant or concern to the attention of the Board of Directors
- Consider and recommend to the Board of Directors the approval of the Trust's and each Academy's budget prior to the start of each financial year.
- Review budget virements as approved by the Headteacher and the CFO and to approve all budget virements above the limit set out in the appendix to this policy
- To provide guidance to the Board and its Committees on financial matters.
- To monitor the financial affairs of the Academy Trust, via budgetary control reports and to report to the Board.
- To agree financial policies and recommend to the Board for approval.
- To consider auditors' reports and ensure that action is taken in respect of any matters arising from internal and external audit reviews.

- To monitor financial reporting to the DfE.
- Ensure the annual accounts are produced in accordance with the requirements of the Companies Act 1985 and the DfE guidance issued to academies;
- To authorise the award of contracts in accordance with the limits set out in the appendix to this policy.
- To monitor and review the Trust Risk Register, and to take responsibility for the risk management process.
- Review the risks to internal financial control within the Trust and agree a programme of work which will address these risks.
- Monitor and review the effectiveness of the Trust's internal audit function.
- Ensure that the Trust has sufficient insurance cover
- Selection, planning and oversight of any capital projects
- Ensure that an asset register is maintained, that periodic checks of asset existence are undertaken and to authorise the disposal of individual assets that have become surplus to requirements or obsolete with an original purchase value in excess of £5,000.
- Ratify and monitor the Academy Trust's Health and Safety policy
- To determine matters relating to building maintenance including Health & Safety and lettings outside school hours.
- Ensure that an annual Health & Safety audit of the Academy premises takes place and reports are received.
- To confirm that the Trust has adequate procedures and processes in place to ensure compliance with statutory and contractual human resources and payroll regulations .
- Authorise the CEO to determine levels of pay when appointing staff
- Receive periodic reports detailing significant recruitment and staff absence issues and consider potential impact on staff welfare and school/trust budgets, and to make recommendations to the Board for action as appropriate
- Receive periodic reports detailing any potentially serious employee relations issues and to make recommendations to the Board for action as appropriate

Local Governing Bodies ("LGBs")

Local Governing Bodies at each Academy within the Trust have delegated responsibilities and work within the powers as described in the Trust Scheme of Delegation. The Scheme of Delegation is reviewed annually.

Accounting Officer

Each Academy Trust must appoint, in writing, a named individual as its accounting officer. The individual must be a fit and suitable person for the role. The Chief Executive Officer ("CEO") is the Trust's appointed Accounting Officer and has responsibility for ensuring high standards of probity in the management of public funds, particularly:

- value for money – achieving the best possible educational outcomes through the economic, efficient and effective use of resources. A key objective is to achieve value for money not only for the trust but for taxpayers generally.

- regularity – dealing with all items of income and expenditure in accordance with legislation, the terms of the trust's funding agreement and the handbook, and compliance with the trust's internal 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

  In addition, the Accounting Officer will;

- Complete and sign a statement on regularity, propriety and compliance annually to be submitted to the DFE with the audited accounts.
- Demonstrate how the Trust has secured value for money via the governance statement in the audited accounts
- Authorising contracts and orders in accordance with the limits set out in the appendix to this policy
- Be an authorised signatory for cheques and BACS.
- Have authority over the issue and use of Debit Cards

  The Accounting Officer will advise the Board of Trustees in writing, if at any time, in their opinion, any action or policy under consideration by the governing body is incompatible with the terms of the Articles, Academy Trust Handbook or the Funding Agreement.

Academy Headteacher/Head of School

The Academy Headteacher/Head of School has overall executive responsibility for the academy's financial activities. Main responsibilities include;

- Review of the academy's annual budget and monitoring and control of expenditure against the budget during the financial year;
- Overall organisation, management and staffing of the academy, including obtaining approval from the Local Governing Body for any changes to staffing structure;
- Obtaining approval at LGB level for the annual budget;
- Approving virements between budget headers in accordance with the limits set out in the appendix to this policy;
- Authorising contracts/expenditure in accordance with the limits set out in the appendix to this policy;

Chief Financial Officer ("CFO")

The CFO works in close collaboration with the CEO and the Headteachers, through whom they are responsible to the Directors and Governors. The CFO also has direct access to the Board members via the Audit and Risk Committee. The main responsibilities of the CFO include;

- Ensuring annual budgets are prepared for each school and the central ledger, and co-ordinating approval of the budgets at LGB and Board level in advance of each relevant financial year;
- Maintaining rolling 5 year forecasts for each school and the central ledger;
- Overseeing the day to day management of financial issues including the establishment and operation of a suitable accounting system;

- The management of the Academy Trust's financial position at a strategic and operational level within the framework for financial control determined by the Board;
- The maintenance of effective systems of internal control;
- Maintenance of adequate fixed asset registers
- Ensuring that the annual accounts are properly presented and adequately supported by the underlying books and records of the Academy Trust;
- Ensuring that monthly management accounts are prepared;
- Authorising expenditure in line with the limits specified in the appendix to this policy;
- Authorising BACs payments in conjunction with the CEO or other authorised signatory;
- Ensuring VAT claims are processed quarterly;
- Ensuring forms and returns are sent to the DFE in line with the timetable in the DFE guidance; and
- Ensuring that recommendations raised by internal and external auditors are carried out.

Trust Finance Manager

The Trust Finance Manager is responsible to the CFO for the detailed operation of the Trust's financial systems, and the main responsibilities of the role include:

- Assisting with the preparation of the annual budget and rolling 5-year forecasts;
- The day-to-day management of financial issues including the operation of the accounting system;
- Assisting the CFO with the preparation of monthly management accounts;
- Authorising orders within the limits set out in the appendix to this policy
- Signing cheques in conjunction with the CEO or other authorised signatory;
- Inputting and verification of BACS payments in conjunction with the CEO or other authorised signatory;
- Act as a point of contact and support for finance staff in the academies to ensure efficient processing of financial transactions in line with the Trust Financial Regulations
- Assisting with the preparation of the year-end financial accounts and returns/reporting to the DFE

Budget holder

Budget holders are required to comply with all relevant sections of this manual and to exercise responsibility for the control and monitoring of their budget expenditure.

Other Staff

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

The Internal Auditor

The Internal Auditor is appointed by the Audit & Risk Committee as part of the wider Trust approach to Internal Scrutiny over financial and non-financial controls. The main duties of the Internal Auditor are to provide the Trustees with independent assurance that:

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

The External Auditor

External auditors must be appointed in accordance with the Academy Trust Handbook, and the appointment must be reviewed at least every 5 years.

The CFO is responsible for managing the audit process. On-going monitoring of the performance of the auditors is the responsibility of the Audit and Risk Committee.

3 Pecuniary/Business 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 Academy Trust Board members and staff, are required to declare any financial interests they have in companies or individuals from whom the Academy Trust may purchase goods or services. The register is open to public inspection and for Trustees will be published on the Trust's website.

The register shall include all business interests such as directorships, shareholdings or other appointments of influence within a business or organisation which may have dealings with the Academy Trust. The disclosures shall also include business interests of relatives such as a parent or spouse or business partner where influence could be exerted over a Board member or a member of staff by that person.

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

An example of the Trust's Pecuniary Interests form can be found in Appendix 1

4 Register of People with Significant Control (PSCs)

Companies and LLPs have an obligation to set up and maintain a register of individuals or legal entities which shows who has significant control over the company. Charitable companies limited by guarantee, which include academy trusts and all wholly-owned trading subsidiaries of academy trusts, will be subject to the regime. The PSC register will be maintained by the Trust and an annual statement made through the return required by Companies House.

5 Accounting system

All the financial transactions of the Academy must be recorded on the approved accounting system.

System Access and document retention

Entry to the accounting system is password restricted. Access is restricted to Trust employees and those authorised by the CFO, such as Trust auditors.

Access to the component parts of the accounting system can also be restricted and the Trust Finance Manager is responsible for setting access levels for all members of staff using the system.

All accounting records including invoices and bank statements are retained in accordance with the Trust's records retention policy.

Back-up Procedures

The Trust IT Services Manager is responsible for ensuring that there are effective back up procedures for the system.

Provisions contained in the Trust Disaster Recovery Policy shall be followed in the event of loss of accounting facilities or financial data. This shall link in with the annual assessment made by Board members of the major risks to which the Academy is exposed and the systems that have been put in place to mitigate those risks.

Transaction Processing

All transactions input to the accounting system must be authorised in accordance with the procedures specified in this manual.

Transaction Reports

The CFO and the Trust Finance Manager will obtain and review system reports to ensure that only regular transactions are posted to the accounting system. The reports obtained and reviewed will include;

- Periodic audit trail reports
- Monthly budget reports
- Management accounts detailing expenditure and income against budget
- Journals listings, which will be sample tested by the CEO/COO on a monthly basis to ensure that journals are valid, and have been posted in accordance with the guidance in this policy.

Reconciliations and reviews

The Trust Finance Manager will have responsibility for ensuring the following reconciliations are performed each month and that any reconciling amounts are cleared on a timely basis;

- sales ledger control account;

- purchase ledger control account;
- payroll control account;
- VAT control account;
- all suspense accounts
- Bank account

Any unusual or long outstanding reconciling items must be brought to the attention of the CFO and referred to the Audit and Risk Committee as necessary.

School fund accounts will be reviewed on a monthly basis by the Trust Finance Manager to ensure that all transactions are up to date and accurate.

6 Budgeting and Financial Planning

The Academy Trust prepares both medium term and short-term financial plans, at individual academy and central ledger level, and in consolidated format for the Trust ("budgets")

The Trust's Strategic Plan provides a key framework for the annual budget and the following documents drive the financial planning process:

- WHPT Strategic Plan
- WHPT Growth Strategy
- WHPT Estate Management Plan
- WHPT Offer to schools

School Improvement Plan (SIP)

School Improvement Plans identify the future aims and objectives of each individual academy within the Trust, and how they are to be achieved. Objectives are matched to resources expected to be available.

Each year the Headteacher will discuss the SIP with the LGB, outlining key objectives, supporting the financial planning process. Discussion of the SIP with the LGB should incorporate;

- Consideration of staff deployment
- A review of past activities, aims and objectives
- Definition or redefinition of aims and objectives
- Development of the plan and associated budgets
- Implementation, monitoring and review of the plan
- Evaluation of feedback into the next planning cycle, to identify areas of improvement

Annual Budget

The budget cycle is as follows:

- Autumn terms 1 and 2 (Sept – Dec)
    - Implementation of current budget plans based on Board approved July budget
    - Monitoring income and expenditure (continuous)

    - Reconciliation and closure of previous financial year
- Spring terms 3 and 4 (Jan – Mar)
    - Reforecast current year and rolling 5-year forecast where appropriate
    - Monitoring income and expenditure (continuous)
- Summer terms 5 and 6 (Apr - Aug)
    - Reforecast current year and rolling 5-year forecast where appropriate
    - Monitoring income and expenditure (continuous)
    - Detailed planning for forthcoming year

The CFO has overall responsibility for the budgetary process and prepares the central and consolidated budget. The Headteacher/Head of School working with the CFO are responsible for preparing a budget and rolling 5-year forecast, and for obtaining sign off at LGB level of the annual budget.

The approved budget must be submitted to the DfE in accordance with the issued timetable each year and the CFO is responsible for establishing a timetable which allows sufficient time for the approval process and ensures that the submission date is met.

The Board of Directors must notify the DfE within 14 days if it is formally proposing to set a deficit budget for the current year, which it cannot address after taking into account unspent funds from previous years.

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

The budgetary planning process will incorporate the following elements:

- forecasts of the likely number of pupils to estimate the amount of DfE grant receivable;
- review of other income sources available to each Academy and to the Academy Trust to assess likely level of receipts;
- review of past performance against budgets to promote an understanding of each Academy and the Academy Trust cost base, and to provide guidance on benchmarking and sustainable budget plans;
- Identification of potential efficiency savings;
- review of the main expenditure headings in light of the development plan objectives and the expected variations in cost e.g. pay increases, inflation and other anticipated changes.
- a list of known and planned staffing, fully costed.
- a list of key budget assumptions, highlighting areas of potential risk and outlining possible remedial measures if assumptions do not hold.

Budget reforecast

- The 5-year budget is approved by LGBs and at consolidated level by the Board of Trustees in July each year.

Finalising the Budget

Once the different options and scenarios have been considered, and LGB sign off has been obtained at Academy level, a draft budget shall be prepared by CFO and Trust Finance Manager for approval by the CEO. The budget will then be reviewed by the Audit and Risk Committee and recommended to the Board for approval. The budget shall be communicated to all staff with responsibility for budget headings so that everyone is aware of the overall budgetary constraints.

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

Budget Monitoring and Review

Academy level Monitoring and Review

Monthly reports will be produced by the central Trust finance team for each Head Teacher detailing actual income and expenditure against budget. The reports will be discussed with Headteachers every month and forecasts and suggested requirements agreed.

The Trust finance team will issue budget/spending reports to individual budget holders periodically and on request. Any potential overspend against the budget must be discussed with the Headteacher. The Headteacher and/or CFO will report to the CEO if there is a significant divergence from the agreed plan and will recommend an approved course of action.

The budget is a working document which may need revising throughout the year as circumstances change. Forecast outturn for each academy and the Trust is to be reported on a monthly basis, so that the ongoing accurate position can be ascertained.

All academies have access to Access budgeting and finance through their finance lead, showing the current accounting information against budget.

Trust Level Monitoring and Review

Monthly management reports will be prepared by the CFO. The reports will detail actual income and expenditure against the budget, and updated forecast, cash flow forecast and a balance sheet. KPIs generated from the budget and rolling 5-year forecast will be reported on regularly.

The management reports will be shared with the Chair of Trustees and the Board every month. The Board will consider these when it meets and will ensure that appropriate action is being taken to maintain financial viability.

7 Payroll

Staff appointments

The staff structure for each academy and for the central Trust team is approved by the CEO and Trust Board on an annual basis, alongside the approval of the budget. The following tasks are delegated under the Financial Scheme of Delegation (Appendix A):

- **Appoint a new staff member (within agreed budget);** working with their finance lead, the Headteacher or Central Team functional lead has been delegated direct responsibility for replacing members of staff at the same FTE and allowances as per the approved budget.

- **Appoint a new staff member (outside agreed budget);** working with their finance lead or the CFO, the Headteacher or Central Team functional lead may appoint new staff providing full approval is granted by the CFO. This sign off requirement also applies to any appointment on a different FTE, grade or allowances.

Payroll and HR administration

The main elements of the payroll system are:

- staff appointments;
- payroll administration and
- payments

Staff Appointments

The Trust has established procedures to;

- Provide formal job descriptions and personnel selection criteria
- Ensure that the cost of all appointments, re-gradings and any other contract changes can be met within budgeted resources

Payroll and Expenses

The Academy payroll is administered via a third-party provider, under a service level agreement. The provider is responsible for calculating all deductions from pay, in compliance with current legislation including tax, national insurance contributions and pension.

Employee records are maintained by the Trust HR team. The HR team are responsible for ensuring that any changes to staffing/contracts of employment are authorised by the relevant headteacher or CEO and communicated to the payroll administrator in a timely manner and via secure transfer.

All staff are paid monthly. A master file is created for each employee which records:

- salary;

- bank account details;
- taxation status;
- personal details and
- Any deductions or allowances payable.

Schools inform the Trust HR team of sickness and other absences. The Trust HR Assistant consolidates this information and submits the information to the Payroll Department on a monthly basis.

Claims for additional hours should be made on an adhoc payroll claim form, reviewed and authorised by the budget holder/school-based finance team.

Staff who are paid on submission of a timesheet must complete an adhoc payroll claim form and submit to the central finance team. Authorisation of adhoc payroll claim forms by the appropriate budget holder will be co-ordinated by the central finance team prior to submission of the pay request to the payroll provider.

Unpaid absence must be authorised in advance by the COO/Headteacher. Once authorised, details of the absence should be submitted by the school/department to the central finance team for submission to the payroll provider.

Payments

After the payroll has been processed but before payments are dispatched a report of salary payments by individual and showing the amount payable in total shall be obtained from payroll. The print is reviewed by the Trust Finance Manager/CFO and any amendments/discrepancies are reported to the payroll provider where possible in advance of the payment being released.

All salary payments are made by BACS.

The Trust does not make salary advances, unless a new member of staff joins mid-month and misses the payroll cut-off and requires an advance in their first month. The only other exception to this is where there is an error in the payroll for a staff member which has led to them being underpaid. Any such advances will be authorised in accordance with the bank mandate.

The payroll system automatically calculates the deductions due from payroll to comply with current legislation. The amounts payable are summarised on the gross to net pay reconciliation prepared by the Trust Finance Manager and authorised for payment by the CEO/COO.

After the payroll has been processed the nominal ledger will be updated. Postings will be made both to the payroll control account and to individual cost centres. A summary of these postings will be reviewed and signed off by the CEO/COO.

Staff and Governor expenses

Where Governors or Trustees incur costs in the fulfilment of their duties, they may make a claim for reimbursement in line with the Governors and Trustees expenses policy.

Staff may claim for reasonable expenses incurred in their performance of their duties. Reasonable expenses include

- Travel by public transport (excluding home to work travel);
- Use of own car and parking (excluding home to work travel);
- Unavoidable overnight accommodation
- Meals or subsistence allowance where attendance is over 5 hours
- Reimbursement for the purchase of approved items

Rates and allowances are set out in the Academy Trust's Expenses Policy. All claims must be supported by VAT receipts. Claims will be processed by the Central Finance Team and reimbursed to the staff member via BACS.

The Trust maintains a separate pay policy, which is reviewed annually, and which must be followed by all schools within the Trust.

8 Special staff severance payments/compensation and ex gratia payments

If an academy trust is considering a staff severance payment above statutory or contractual entitlements, it **must** consider the following issues before making a binding commitment, in line with the requirements of the Academy Trust Handbook (2025-26 Section 5.6):

- that the proposed payment is in the trust's interests
- whether the payment is justified, based on legal assessment of the trust's chances of successfully defending the case at employment tribunal – if there is a significant prospect of losing the case, a settlement may be justified, especially if the costs of a defence are likely to be high – where a legal assessment suggests the trust is likely to be successful, a settlement should not be offered
- if the settlement is justified, the trust would need to consider the level of settlement – this **must** be less than the legal assessment of what the relevant body (for example an employment tribunal) is likely to award

Staff severance payments should not be made where they could be seen as a reward for failure such as gross misconduct or poor performance. The only acceptable rationale in the case of gross misconduct would be where legal advice is that the claimant is likely to succeed in an employment tribunal because of employment law procedural errors. In the case of poor performance, an acceptable comparison would be the time and cost of taking someone through performance management and capability procedures.

Where the academy trust is considering a staff severance payment including a non-statutory or non-contractual element of £50,000 or more, (gross, before income tax or other deductions), DfE's prior approval **must** be obtained before making any offer to staff.

Where the Trust is intending to use a confidentiality clause in a severance agreement, pre-approval from the DfE should be obtained in accordance with the requirements of the ATH updated October 2025.

Compensation payments

Compensation payments provide redress for loss or injury, for example personal injuries, traffic accidents or damage to property. If an academy trust is considering a compensation payment, it must base its decision on a careful appraisal, including legal advice where relevant, and ensure value for money.

Academy trusts have delegated authority to approve individual compensation payments provided any non-statutory/non contractual element is under £50,000. Where the trust is considering a non-statutory/non contractual payment of £50,000 or more the DfE's prior approval must be obtained.

Ex-gratia payments

Ex-gratia payments are another type of transaction that go beyond statutory or contractual cover, or administrative rules. Annex 4.13 of HM Treasury's Managing Public Money provides examples, which include payments to meet hardship caused by official failure or delay, and payments to avoid legal action on the grounds of official inadequacy.

Ex-gratia payments are separate to other classes of special payment such as staff severance payments and compensation payments. Statutory and contractual payments made to academy staff in accordance with the trust's pay and conditions policy would not be ex gratia.

Ex gratia transactions must always be referred to DfE for prior authorisation. HM Treasury approval may also be needed dependent on the nature of the transaction.

9 Purchasing and Procurement

Purchasing goods

Value for money

The Trust is committed to achieving best value in all areas of procurement and to following the general principles of;

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

Separation of duties

In order to reduce the risk of error or fraud, the CFO will ensure there is clear separation of duties within the finance team.

Separation of duties	
Orders raised (either via Access requestion or by excel order form)	Designated staff and budget holders
Orders processed	Designated Finance staff for Primaries

	Trust Finance Officer for Secondaries
Orders authorised	In line with sign off policy in the appendix to this document
Goods & Services received	Budget holder/school office/administrator
Payments processed or returns made	Trust Finance Officer
Payments authorised	CEO/COO plus either CFO or Trust Finance Manager

Routine Purchasing

Budget holders will be informed of the budget available to them. It is the responsibility of the budget holder to manage the budget and to ensure that the funds available are not overspent.

Routine purchases in accordance with current delegation of authority can be ordered by budget holders. Quotes or prices for orders must be obtained in accordance with the requirements set out in "Procurement Policy" below. Where possible, a supplier should be chosen from the list of Trust approved suppliers, held in the Finance System.

All orders should be made, or confirmed, in writing using the Trust order form available on the local network or via the online requisition process where applicable. Where relevant, and in accordance with the requirements set out below, alternative quotes should be obtained and attached to the order.

Orders will be produced automatically from the accounting system, allocated a reference number and dispatched to the supplier by the Finance Office.

Some goods or services will not require a purchase order, due to the nature of the supply. The following are examples of goods/services that do not require a purchase order:

- Utilities
- Supply staff agency costs (albeit a purchase order is required for longer term, planned supply arrangements)
- Free school meals charges

Occasionally budget holders may need to make purchases to cover an emergency situation. In such cases, a confirmation order should be raised to ensure that documentary evidence is in place to support the payment process.

Contracted purchases

Some revenue services are provided on a regular basis by outside suppliers, under the terms of a negotiated service level agreement/contract. Examples of such services are those for catering, insurance and utilities. In these cases, payment is made against an invoice, and the contract itself forms the basis for agreeing the invoice.

Once the contracts are in place, invoices may be approved against them, with approval from the Headteacher and CFO/Trust Finance Manager.

Internet ordering

The preferred method of payment for internet purchases remains supplier invoice. If the supplier will only accept debit/credit card payment, then the school charge card may be used. No payment card details should be saved on any website for future use.

Exemption from the Application of the Procurement & Contract Spend Threshold Requirements

An application for exemption can only be made for requirements which fall in value terms under the spend threshold for the PA 2023.
An application can be made for an exemption from the procurement and spend threshold requirements set out in this policy by submitting a request to the Board of Trustees (through the Audit and Risk Committee), CEO or CFO as per the delegated authority levels detailed above. The exemption will only be applied in the following circumstances:

a. The spend is urgently required and delay would cause loss, injury or damage, The urgency must be brought about by events that were unforeseeable by and not attributable to the Trust and which will result in loss or damage to the Trust if the suspension or exemption is not allowed; and / or
b. The spend is of such a special nature that no advantage would be gained by inviting competitive tenders; or
c. There is no effective competition because payment is fixed under statutory authority, or the item is a patented or proprietary article or is available from only one source.
d. Additional orders raised within an existing contract, cost negotiated and additional spend does not cause the contract to go above the spend threshold.

The following must be considered before applying for an exemption:

a. Lack of planning and / or internal process delays will not constitute special, exceptional or emergency circumstances.
b. Exemptions from this guidance must not be applied for retrospectively.
c. Exemptions from this guidance must not be applied for where spend will exceed the relevant PA 2023 Spend Threshold.
d. Value for Money being achieved in accordance with the Academy Trust Handbook.

Receipt of goods/services

On receipt the budget holder must undertake a detailed check of the goods received against the goods received note (GRN) and make a record of any discrepancies between the goods delivered and the GRN. Discrepancies shall be discussed with the Finance Office without delay.

If any goods are rejected or returned to the supplier because they are not as ordered or are of sub-standard quality, the Finance Office should be notified.

All invoices will be sent to the Finance Office. The Finance Office will stamp invoices with a digital stamp against which the following can be evidenced:

A) Goods/Services received;
b) School

c) Order number OR Cost centre/ledger code
d) Budget holder authorisation
e) Finance Team Leader/ Trust Finance Manager authorisation

Additional levels of authorisation are included for Headteacher/CEO based on the limits set out in Appendix 2 to this policy.

The invoice is then processed via Xodo (formerly known as "Eversign") for digital authorisation. Goods Received (GRN) will be completed by the originator prior to Budget Holder authorisation. The invoice will then be automatically processed through any additional levels of authorisation, before returning to the Finance Team Leader/ Trust Finance Manager for final sign off.

Budget holders must undertake these checks without undue delay.

If a budget holder is pursuing a query with a supplier, the Finance Department must be informed of the query and periodically kept up to date with progress.

Payments

The Finance Office will input details of payments to be made to the purchase ledger and generate the BACS payments required. The payments and associated paperwork must be authorised by two of the nominated cheque signatories.

BACS payments will be dispatched to suppliers by the Finance Office who will evidence payment by production of a payment list and then place it in the appropriate file.

10 Debit and charge cards

The Academy Trust maintains two debit cards attached to the Finance Team Leader and the Trust Finance Manager roles. All procedures covering approval and payments are the same as for routine invoice-based purchases.

Corporate charge cards are allocated to named individuals for the purpose of purchasing where it is not possible to create a supplier account, or where there is operational benefit to purchase in this way.

Corporate Cards are arranged by the Trust Finance Manager, who maintains the list of all card holders and approved limits. All card holders must read and sign an Acceptance Form which clearly states the conditions of use (Appendix 4). Signed forms are stored centrally.

Confirmation of the expenditure is made via a Charge Card Expenditure form, submitted along with evidence of purchase to the Finance mailbox.

Charge card transactions should be kept to a minimum – the preferred purchasing route is via a supplier who will accept an order and a related BACS payment.

Each charge card has a specific monthly and transaction limit, and these are regularly reviewed.

No cash withdrawals are permitted on the charge card.

Cash withdrawals can be made using the debit card. This is restricted to the Trust Finance Manager, in exceptional circumstances, with prior approval from the CFO. Identity confirmation is required by the bank.

11 Procurement

From 24 February 2025, the Trust will comply with the Procurement Act 2023 ("PAct") and its associated regulations and statutory guidance in respect of any steps taken in connection with awarding, entering, managing and terminating a relevant contract. Until then (and in relation to contracts pre-dating the PAct), the Trust will continue to comply with the Public Contracts regulations 2015 ("PCR") and for related detail, staff should refer to the previous version of this Financial Regulations Policy, dated May 2023.

Procurement Thresholds

This policy sets out different procurement procedures based on contract values (See Appendix 2). Note that the value of the contract is for the full contract duration.

	Value of contract	Procedure
Procedure 1	Less than £5,000	Value for money
Procedure 2	£5,001 to £40,000	Three written quotes
Procedure 3	Over £40,000 up to the relevant PAct threshold	Mini tender or use of purchasing framework
Procedure 4	Over the PAct threshold	Full tender in accordance with the PAct

Any purchase of goods or services over £10,000 should be discussed by the Headteacher and CFO/Trust Finance team Manager/Trust Head of Property and Estates prior to any communication with suppliers to ensure that the correct procedures are followed.

Procedure 1 – Purchases of less than £5,000

Below £5,000, discretion may be exercised as to whether to obtain quotes. Value for money should also be considered against the following factors:

- Price and ongoing costs
- Quality
- Ability to deliver on time
- Customer service and after care

Procedure 2 – Purchases of £5,001 to £40,000

3 competitive quotes should be obtained. The quote requests made to suppliers should contain a clear specification as to the goods/services required to allow for comparability of quotes. The request should also set out the closing date for submission, and criteria which will be used to evaluate the quotes.

Quotes will only be opened after the closing date for submissions, and any quotes submitted late will not be considered.

Quotes will be assessed by at least 2 staff members, who will independently score the submissions against the pre-determined criteria. Scores will then be compared and where a difference of opinion arises, a detailed review will determine the final outcome.

All scoring and notes from the post scoring discussion and award decision will be submitted to the CFO and retained on file along with the purchase. The notes will also be summarised by the CFO to support the presentation of the decision to the audit and risk committee for approval, if the contract value is greater than £25,000.

Details of quotes obtained should be attached to purchase orders in the finance system.

In certain circumstances such as sole supplier, specialist services, or in the case of emergencies, it may not be possible to obtain more than one quote for goods/services. In such cases, where the value of the goods/services is more than £5,000 but less than £40,000, the CFO has the discretion to approve the purchase as long as value for money has been demonstrated.

Procedure 3 – Purchases of over £40,000 up to the PAct threshold

The Trust CEO and CFO/COO must ensure that all contracts with a value in excess of £40,000 are procured via an appropriate tender process.

A DfE approved or other recognised framework will be used where deemed to offer best value for money. If a framework is not used, the process below should be followed.

A specification should be completed, alongside detail of the criteria for evaluation and scoring of tenders.

ITT (Invitations to Tender) may be emailed directly to suppliers and posted on the Trust website. The ITT will also be posted on the government find a contract service if appropriate.

The ITT will include

- Introduction/background to the project;
- timeline
- Scope and objectives of the project, including ongoing contract management requirements;
- Technical requirements;
- Implementation of the project;
- Terms and conditions of tender,
- Award criteria, and
- Form of response.

During the clarification stage, questions will be requested via e mail and replies will be sent to all suppliers. Queries and questions communication will be filed along with the tender pack.

Quotes will only be opened after the closing date for submissions, and any quotes submitted late will not be considered.

Quotes will be assessed by at least 2 staff members, who will independently score the submissions against the pre-determined criteria. Scores will then be compared and where a difference of opinion arises, a detailed review will determine the final outcome.

All scoring and notes from the post scoring discussion and award decision will be submitted to the CFO and retained on file along with the purchase. The notes will also be summarised by the CFO to support the presentation of the decision to the audit and risk committee for approval.

Written details of ITT submissions should be attached to purchase orders.

Procedure 4 – Purchases over the PAct threshold

The statutory procurement process must be followed for purchases with a value exceeding the PAct threshold. Advice may be required from procurement law specialists depending on the nature of the contract.

The procurement proposal must be pre-approved by the Audit and Risk Committee, along with any capital project plans where relevant.

One of the following forms of tender may be followed.

(1) Competitive Award (Open or Flexible)

- **Open Tender;** This is a single -stage procedures where all potential suppliers are invited to tender.
- **Flexible Tender**: This is a stage procedure and may be used where there is a need to limit the number of bidding suppliers.

(2) Direct Award

This process will only be used if permitted under the PAct. Legal/expert advice may be necessary to support this decision.

(3) Award under framework

A contract may be awarded in accordance with a framework following a competitive selection process.

(4) Light Touch Regime

Where the contract type permits, a light touch tender process may be selected.

Overview of Tender Process

Preparation for Tender

Full consideration shall be given to:

- Objective of project
- Procurement objectives; value for money, maximising public benefit, transparency and acting with integrity
- Overall requirements
- Where assessment criteria are used, indicate their relative importance
- Technical skills required

- After sales service requirements
- Type of tender procedure to be followed
- Form of contract.
- Whether the Trust should issue a planned procurement notice
- Whether the Trust should carry out preliminary market engagement
- Whether the contract could be supplied under more than one contract and whether contracts should be awarded by reference to lots

Evaluation of Tenders

The evaluation process shall involve at least two people. Those involved shall 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.

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.

Full records should be kept of all criteria used for evaluation and for contracts over £25,000 a report shall be prepared for the Audit and Risk Committee highlighting the relevant issues and recommending a decision. Where required by the conditions attached to a specific grant from the DfE, the department's approval must be obtained before the acceptance of a tender.

Consideration should be given to:

- The most advantageous tender which satisfies the Trust's requirements and the assessment criteria
- Financial factors
    - consider whether a lower price equates to a reduced service or lower quality
    - Are the tenders comparable in terms of including all related contract costs?
    - Financial status of the supplier
- Technical/suitability
    - Qualifications and experience of the contractor
    - Evidence of quality and compliance (eg H&S)
    - Quality control procedures

Award decision

- The accepted tender should be the one that is most advantageous to the Trust.
- All parties should be informed of the decision.

12 New supplier checks/contract due diligence

Supplier lists are maintained within the Finance System and new suppliers may only be set up for payment by the Central Finance Team. Prior to authorising a new supplier, the Central Finance Team will undertake the following checks:

- Receipt of a fully completed New Supplier Information Form
- Companies House (or self employed status check if the supplier is an individual)
- Website check to verify information from the New Supplier Form

- Clarify details where companies are not VAT registered
- Verification of bank details from invoice to completed Suppler Form
- Where bank details have changed, the company is telephoned for verification and an updated Supplier Information form is requested for completion

The following additional due diligence should also be considered prior to the award of a contract if not already undertaken as part of the evaluation of tenders:

- Validation of insurance and indemnity certificates
- Validation of professional memberships/qualifications
- Credit check
- DBS checks of key personnel
- Professional references
- IR35 review where relevant

13 Trading with connected parties and related parties

Academy trusts must be even-handed in their relationships with related parties by ensuring that;

- trustees comply with their statutory duties as company directors to avoid conflicts of interest, not accept benefits from third parties, and declare interest in proposed transactions or arrangements

- all members, trustees, local governors of academies and senior employees complete the register of interests

- no member, trustee, local governor, employee or related individual or organisation uses their connection to the trust for personal gain, including payment under terms that are preferential to those that would be offered to an individual or organisation with no connection to the trust
- there are no payments to trustees by the trust unless permitted by the articles, or by authority from the Charity Commission, and comply with any relevant agreement with the Secretary of State. Trusts will need to consider these obligations where payments are made to other business entities who employ the trustee, are owned by the trustee, or in which the trustee holds a controlling interest

- the Charity Commission's approval is obtained where the trust believes a significant advantage exists in paying a trustee for acting as a trustee

- payments provided to specific groups of people are made in compliance with the "at cost" requirements set out below.

The Board of Directors will ensure requirements for managing related party transactions are applied across the trust. The board chair and the accounting officer will ensure their capacity to control and influence does not conflict with these requirements. They will manage personal relationships with related parties to avoid both real and perceived conflicts of interest, promoting integrity and openness in accordance with The 7 principles of public life.

Trusts must recognise that some relationships with related parties may attract greater public scrutiny, such as:

- transactions with individuals in a position of control and influence, including the board chair and accounting officer
- payments to organisations with a profit motive, as opposed to those in the public or voluntary sectors

- relationships with external auditors beyond their duty to deliver a statutory audit.

The trust will keep sufficient records, and make sufficient disclosures in their annual accounts, to show that transactions with these parties, and all other related parties, have been conducted in accordance with the high standards of accountability and transparency required within the public sector.

Reporting and approval of related party transactions

Trusts must report all contracts and other agreements with related parties to DFE in advance of the contract or agreement commencing, using DFE's related party on-line form.

Trusts must obtain DFE's prior approval, using DFE's related party on-line form, for contracts and other agreements for the supply of goods or services to the trust by a related party agreed on or after 1 Sept 2023 where any of the following limits arise:

- a contract or other agreement exceeding £40,000

- a contract or other agreement of any value that would mean the cumulative value of contracts and other agreements with the related party exceeds, or continues to exceed, £40,000 in the same financial year ending 31 August.

This approval requirement does not apply in the following circumstances:

- contracts and other agreements for the supply of goods or services to a trust by the following educational establishments:
    - colleges, universities and schools which are sponsors of the academy trust
    - state funded schools and colleges, including academy trusts

This concession does not apply to transactions with a subsidiary of such a related party.

For the purposes of reporting to, and approval by, DFE contracts and agreements with related parties do not include salaries and other payments made by the trust to a person under a contract of employment through the trust's payroll.

Approval of novel, contentious and/or repercussive related party transactions

Novel, contentious and/or repercussive related party transactions are subject to separate arrangements. Trusts must obtain DFE's prior approval for any contracts and other agreements with related parties that are novel, contentious and/or repercussive, regardless of value. Approval must be sought using DFE's enquiry form, not through the related party on-line form. Trusts should carefully consider the impact of this requirement and its relevance to transactions involving the board chair and/or the accounting officer.

Register of interests

The academy trust's register of interests must capture relevant business and pecuniary interests of members, trustees, local governors and senior employees, including:

- directorships, partnerships and employments with businesses
- trusteeships and governorships at other educational institutions and charities
- for each interest: the name and nature of the business, the nature of the interest and the date the interest began.

The register must identify relevant material interests from close family relationships between the academy trust's members, trustees or local governors. It must also identify relevant material interests arising from close family relationships between those individuals and employees.

Trusts should consider whether other interests should be registered, and if in doubt should do so. Boards of trustees must keep their register of interests up-to-date at all times.

Trusts must publish on their websites relevant business and pecuniary interests of members, trustees, local governors and accounting officers. Trusts have discretion over the publication of interests of other individuals named on the register.

At cost requirements

The trust must pay no more than 'cost' for goods or services ('services' do not include contracts of employment) provided to it by the following persons ('persons' meaning both individuals and organisations):

- members or trustees of the academy trust

- individuals or organisations related to a member or trustee of the academy trust. For these purposes the following persons are related to a member, or trustee:

    - a relative of the member or trustee. A relative is defined as a close member of the family, or member of the same household, who may be expected to influence, or be influenced by, the person. This includes, but is not limited to, a child, parent, spouse or civil partner

    - an individual or organisation carrying on business in partnership with the member, trustee or a relative of the member or trustee

    - a company in which a member or the relative of a member (taken separately or together), and/or a trustee or the relative of a trustee (taken separately or together), holds more than 20% of the share capital or is entitled to exercise more than 20% of the voting power at any general meeting of that company

    - an organisation controlled by a member or the relative of a member (acting separately or together), and/or a trustee or the relative of a trustee (acting separately or together). For these purposes an organisation is controlled by an individual or organisation if that individual or organisation can secure that the affairs of the body are conducted in accordance with the individual's or organisation's wishes

- any individual or organisation given the right under the trust's articles of association to appoint a member or trustee of the academy trust; or anybody connected to such individual or organisation

- any individual or organisation recognised by the Secretary of State as a sponsor of the academy trust; or anybody connected to such individual or organisation.

A body is connected to another individual or organisation if it is controlled by the individual or organisation, or controls the organisation, or is under common control with the individual or organisation. For these purposes, control means:

- holding more than 20% of the share capital (or equivalent interest), or
- having the equivalent right to control management decisions of the body, or
- having the right to appoint or remove a majority of the board or governing body.

The 'at cost' requirement does not apply to the trust's employees unless they are also one of the parties described above.

While these provisions do not apply to contracts of employment, the principles of value for money and using public money properly, including managing conflicts of interest, still apply. Salaries should be appropriate to the individual's skills and experience and to wider market rates.

The 'at cost' requirement applies to contracts with a related party exceeding £2,500, cumulatively, in any one financial year. Where a contract takes the trust's cumulative annual total with the related party beyond £2,500, the element above £2,500 must be at no more than cost.

14 Tax

VAT

The Trust is VAT registered and the Trust Finance Manager is responsible for the submission of the quarterly VAT return within the required timescales.

Self-employed status

Checks must be made prior to making payments to an individual who is not on the payroll, using the employment status checker at: www.gov.uk/guidance/check-employment-status-for-tax

Further information should be obtained from the individual as necessary in order to complete the status check. The individual should also complete the form shown at Appendix 3 to this report to confirm that they will declare all payments from the school to the Inland Revenue.

15 Income

The main sources of income for the Academy are the grants from the DfE. The receipt of these sums is monitored directly by the Trust Finance Manager who is responsible for ensuring that all grants due to the Academy Trust are collected.

The Academy Trust also obtains income from:

- Other grant awarding bodies
- The local authority (eg High Needs funding)
- Students, mainly for trips
- Families, for wrap around care and certain Early Years provision
- Insurance providers, in respect of insurance claims
- Lettings
- Catering income

All income received must be accompanied by a remittance slip which is used to reconcile the income to the bank account and to create the cashbook journal posting in Access Financials.

<u>My Child at School (MCAS)</u>

MCAS is the Bromcom secure online payment system, used by all Trust academies. It allows parents to pay quickly and securely for school meals, trips and afterschool care and activities and music lessons.

Each academy is responsible for maintaining systems with up-to-date pupil data and for setting up the “service” within MCAS relevant to each trip/activity. The Trust is responsible for reconciling income and ensuring the funds are credited to each school on a timely basis.

<u>Grant income</u>

Schools and Trust central ledger may receive grants from other government and non-government sources. The Trust Finance Manager will monitor the receipt of all such income and ensure it is allocated to the relevant nominal ledger code.

The Trust Finance Manager/CFO will be responsible for liaising with other relevant Trust staff to ensure the timely completion of any mandatory reporting returns associated with the grant.

<u>Trips</u>

A lead contact must be appointed for each trip to take responsibility for the management of the trip, including discussions with the Finance team for the secondary schools, or the school based Finance lead for the primary schools to determine the appropriate level of charge to be made to ensure the trip does not run at a loss.

For security of income, the preferred methods of payments are online via the MCAS payment portal. A receipt will be issued and the value of the receipt will be recorded against the student making the payment. Any cash payments are to be banked by the relevant school on a timely basis.

The school/ central Finance lead shall maintain an up-to-date record for each student showing the amount paid and the amount outstanding. This record shall be sent to the lead contact who will be responsible for assisting in the chasing of outstanding amounts.

Lettings

The Finance Team Leader in liaison with the Head of Property & Estates and school site staff are responsible for maintaining records of bookings of the facilities at the Alderman White School and Bramcote College and for identifying the sums due from each organisation. Payments will be invoiced for the use of facilities.

Where other schools in the Trust undertake lettings, details of all bookings will be provided by the school to the central finance team and the finance team will issue invoices for payment.

Details of organisations using the facilities will be maintained by the Trust Finance Officers who will establish a sales ledger account and produce a sales invoice from the accounting system. The Trust Finance Officers are responsible for chasing outstanding debts and ensuring no use is made of the facilities unless payment has been made.

No debts shall be written off without the express approval of the CFO. The CFO will notify the Audit and Risk Committee of any amounts over £100 and the reasoning behind the decision (the DfE’s prior approval is also required if debts to be written off are above the value set out in the annual funding letter).

Organisations using the facilities shall be instructed to send all payments to the Finance Office.

Catering income

MCAS is used by parents to top up funds for students to pay for school meals. In primary settings a pre-order system is in place that will deduct monies from the MCAS account for meal/food consumption. In secondary settings the Vericool POS system is used, which links to MCAS to deduct funds for foods purchased.

Students in receipt of FSM will have the applicable FSM value added to their accounts by the admin team in the relevant school. Any items purchased over this daily value will be charged to the student’s MCAS account.

Extended School Services – Breakfast Club,wrap around and Early Years provision

Under the Trust Charging and Remissions policy, schools within the Trust may charge for certain Early Years provision. Schools within the Trust may also have wrap around provision and breakfast clubs for which charges are made.

A lead person should be identified at each relevant academy to take overall responsibility for the financial monitoring of Extended School Services. The lead person will be responsible for;

- Preparing a record at the start of each half term listing details of pupils that are planned to attend any Extended School Service and then tracking uptake of each of the activities

- Notifying parents/carers of the cost of the activity

Where possible, charges for such provision should be made through the Bromcom parent online payment portal MCAS and should be paid for in advance. Where families chose to make payments outside of the portal, schools should provide a list of names to the central finance team to allow for such income to be correctly recorded in the nominal ledger.

16 Sales invoices, debtors and contactless card payments

If schools need to raise sales invoices, these should be raised through the Trust Finance Team.

Payment should be obtained as and when goods/services/activities are provided wherever possible.

If no payment is received within 30 days of the invoice date, then a reminder should be issued to the debtor. The final reminder should clearly state that legal action will be taken if the debt is not settled within a further 14 days of the reminder.

Schools should only consider writing off debtor balances after all reasonable action has been taken to recover the debt and following consultation with the Trust Finance Manager/CFO.

Requests to write off debts in excess of £5,000 must be referred to the CFO/CEO who will submit the request to the Audit and Risk Committee for consideration. The Trust must seek permission from the Secretary of State to write off individual debts exceeding the threshold set out in the Academy Trust Handbook.

Contactless card payments

- Contactless card readers may be used to process payments in certain circumstances such as entry for events at schools.
- Payments using card machines should only be taken when the card holder is present.
- Refunds for any payments received in this way should be made via the finance system and not via the contactless card machines.
- All records associated with such payments will be retained by the central finance team in accordance with the data retention policy

17 Custody of cash receipts

Official Academy receipts shall be issued for all cash received where no other formal documentation exists. All cash must be kept in the Finance Office safe prior to banking. Banking shall take place once a week if the sums collected exceed the £5,000 insurance limit on the Finance Office safe.

Monies collected must be banked in their entirety in the appropriate bank account. The Finance Officer is responsible for preparing and processing the paying in slip details. The Finance Team Leader completes the reconciliations between the sums collected, the sums deposited at the bank and the sums posted to the accounting system. The reconciliations must be prepared promptly after each banking and must be reviewed and certified by the Trust Finance Manager.

Float monies (Bramcote College and Foxwood Academy)

Bramcote College and Foxwood Academy maintain a cash float of £150 each on site. The balance is identified in the accounting system as part of overall School Fund balances and is assigned an analysis code to maintain visibility within monthly budget reviews. The float is stored in a cash safe on each site.

The Headteacher and School Operations & Admin Manager at Bramcote College, and the Headteacher and School Business Manager at Foxwood Academy, are the authorised personnel with access to the safe, which will remain locked at all times.

The float money is to be used strictly for fund-raising events only, as approved by the Head Teacher.

A Float tracker spreadsheet sets out the value of cash using each £5, £1, £0.50 and £0.20 denomination. The withdrawal of the cash from the safe must be recorded on the spreadsheet, including the date, amount used and purpose.

At the end of the fund-raising event, the cash must be returned to the safe in the original denominations. The total value must remain at the agreed level of £150.00.

The School Operations & Admin Manager (BC) and School Business Manager (FWA) will conduct regular checks to ensure the float amount is accurate and accounted for. Any discrepancies must be reported immediately to the Trust Finance Manager.

Each school will send the updated logging spreadsheet to the Trust Finance Team at the end of each school term. The cash tin balance of £150.00 will be verified, and approved by the Head Teacher.

A digital report of the termly verification will be retained by the Trust Finance Team.

18 Treasury Management

Bank Accounts

The Trust will operate one single bank account for operational transactions, the management of which will be a function of the central finance team.

The Trust also maintains a Commercial Instant Access Savings account with Lloyds Bank, to facilitate short-term sweeping of excess funds, attracting higher interest rates. The management of this account is a function of the central finance team

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

Project-specific Bank Accounts

The Trust may be required to enter into specific banking arrangements to facilitate particular projects.

The Trust is currently operating a Barclays escrow account, in conjunction with Nottinghamshire County Council for the duration of the project to re-build Bramcote College. The escrow mechanism was a requirement under the terms of the project contract. Only income and expenditure relating to the project may be remitted into/extracted from the account. The Trust COO is the "signatory" on the account and is responsible for any request for payment using the escrow funds, which is then counter-approved by the relevant signatory from Nottinghamshire County Council.

Deposits

Particulars of any deposit must be entered on a copy paying-in slip, counterfoil or listed in a supporting book. The details shall include:

- The amount of the deposit and
- A reference, such as the number of the receipt or the name of the debtor.

Payments and withdrawals

All cheques and other instruments authorising withdrawal from Academy Trust bank accounts must bear the signatures of two of the following authorised signatories:

- CEO;
- Trust Operations Director
- Trust Finance Manager;
- Other authorised signatory as agreed by the Academy

This provision applies to all accounts, public or private, operated by or on behalf of the Board of the Academy Trust.

Administration

The Trust Finance Manager must ensure bank statements are received regularly and that reconciliations are performed at least on a monthly basis. Reconciliation procedures must ensure that:

- All bank accounts are reconciled to the Academy Trust's cash book;
- Reconciliations are prepared by the Trust Finance Manager;
- Reconciliations are subject to an independent monthly review carried out by the Trust COO or CEO;
- Adjustments arising are dealt with promptly.

Petty Cash Accounts

The Academy Trust does not retain petty cash.

Cash Flow Forecasts

The CFO is responsible for preparing cash flow forecasts to ensure that the Academy Trust has sufficient funds available to pay for day-to-day operations. If significant balances can be foreseen, steps shall be taken to invest the extra funds.

Any indication of cash flow difficulties will be brought to the attention of the Audit and Risk Committee.

Investments

Investments must be made only in accordance with written procedures approved by the Board.

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

19 Fixed assets

Asset register

All items purchased with a value over the Academy's capitalisation limit (£1,000) must be entered in an asset register. The asset register shall include the following information:

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

The Asset Register helps to:

- 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;
- The external auditors to draw conclusions on the annual accounts and the Academy's financial system and
- Support insurance claims in the event of fire, theft, vandalism or other disasters.

Security of assets

Stores and equipment must be secured by means of physical and other security devices. Only authorised staff may access the stores.

All unique, easily portable items in the register should be permanently and visibly marked as the Academy's property and physical counts will be undertaken against the register periodically.-Discrepancies between the physical count and the amount recorded in the register shall be investigated promptly and, where significant, reported to the Audit and Risk Committee. Inventories of Academy property shall be kept up to date and reviewed regularly.

Disposals

Items which are to be disposed of by sale or destruction must be authorised for disposal by the Trust Operations Director and, where significant, shall be sold following competitive tender.

The Academy Trust is expected to reinvest the proceeds from all asset sales for which capital grant was paid in other Academy assets. If the sale proceeds are not reinvested then the Academy must repay to the DFE a proportion of the sale proceeds.

All disposals of land must be agreed in advance with the Secretary of State.

Loan of Assets

Items of Academy Trust property must not be removed from Academy premises without the authority of the Head of Department. A record of the loan must be recorded on a loan agreement and booked back in when it is returned.

If assets are on loan for extended periods or to a single member of staff on a regular basis the situation may give rise to a "benefit-in-kind" for taxation purposes. Loans shall therefore be kept under review and any potential benefits discussed with the Academy's auditors.

20 Leasing

There are two types of lease, as defined under relevant financial reporting standards;

- finance leases - which are a form of borrowing.
- operating leases - which do not involve borrowing.

Academy trusts must seek and obtain prior written approval from the Secretary of State, via the DFE, for the following leasing transactions:

- Taking up a finance lease on any class of asset for any duration from another party, as this would represent borrowing
- Taking up a leasehold or tenancy agreement on land or buildings from another party for a lease term of more than five years
- Granting a leasehold or tenancy agreement on land or buildings to another party for a lease

21 Internal Control Framework

This section covers the processes and procedures the Trust uses to ensure that this manual is complied with and therefore that the Trust is following the requirements outlined in the Academy Trust Handbook.

Risk Management

The WHPT Risk Management Policy sets out the process for managing risk across the Trust, including financial risks, and this manual sets the policy and procedure to mitigate risks across the Trust. The CEO is responsible for ensuring this manual is complied with. The Access Financials system and Lloyds and Barclays bank controls are in place to ensure that financial controls are in line with this manual.

<u>Segregation of duties</u>

All policies and processes, especially payroll, are set to ensure there are segregation of duties, to mitigate risks and to ensure that no single individual can sign off contractual changes.

<u>Monitoring and control of Academies</u>

Throughout the daily control processes the Finance Team, CFO and C00 play a vital role in ensuring that the academies and Trust comply with the financial delegations and authorisations. This is the benefit of a centralised finance function across the academies, with all invoices over a threshold scrutinised.

<u>Internal Scrutiny</u>

The Trust's programme of internal scrutiny is managed by the CFO and COO under the review of the Audit and Committee. The Trust must identify, on a risk-basis with reference to its risk register, the areas it will review each year. Greater scrutiny may be required where procedures or systems have changed. This process will provide independent assurance to the Board that its financial and nonfinancial controls and risk management procedures are operating effectively.

Internal scrutiny must focus on:

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

The Trust must also provide the DfE with annual internal scrutiny report for the areas outlined in the link below and this is managed by the CFO and COO as outlined in this guidance - www.gov.uk/guidance/academies-financial-handbook/part-3-internal-scrutiny

Appendix 1 – Pecuniary/Business Interests declaration

Declaration of pecuniary and personal interest

Name: ____

School: ____

Position: --

I ____________________________, declare as an employee/Trustee of The White Hills Park Trust/Governor of [   ] that I hold the following personal and/or pecuniary interest(s):

Pecuniary interests	Please provide details of the interest
Current employment – name of employer and your role	
Businesses (of which I am a partner or sole proprietor)	
Company directorships – details of all companies of which I am a director	
Charity trusteeships – details of all charities/charitable companies of which I am a trustee	
Membership of professional bodies, membership organisations, public bodies or special interest groups of which I am a member and have a position of general control or management	
Gifts or hospitality offered to you by external bodies while acting in your position as an employee and whether this was declined or accepted in the last 12 months	
Contracts offered by you for the supply of goods and/or services to the trust/school	
Any other conflict	

Personal interests	Name	Relationship to me	Organisation	Nature of the interest
Detail any close family/close connections to the employee/Trustee/Governor who are employed by the Trust				
Company directorships or trusteeships of family/close connections to employee				

If you are a Director, trustee or Governor of any other schools and/or academies, please provide details below:

Name of school/academy: ....

Position held: ....

Date appointed/elected to post: ....

Date of termination to post: ....

To the best of my knowledge the information supplied above is correct and complete. I understand that it is my responsibility to declare any conflict of interest/loyalty, business or personal that relates directly or indirectly, to myself or any relation in any contract, proposed contract or other matter when present at a meeting at the school where such contract or matter comes under consideration. I understand that I must withdraw from any meeting during the discussion of such contract or matter and must not vote in respect of it.

I agree to review and update this declaration annually and give consent for the information provided to be used in accordance with the trust/school's conflicts of interest policy.

Signed: ....

Date: ....

Appendix 2: Financial Scheme of Delegation

Authorisation limits for orders and payments for goods and services

Delegated responsibility	Value	Authority to raise order/process transaction for order	Method of payment and approver
Orders and expense claims payments for goods and services	Up to £1,000	Budget holder	Order form Payment via charge card or BACS Approver – Finance Team Leader /Trust Finance Manager
	Up to £10,000	Budget Holder plus Head Teacher/Chief Operating Officer for central purchases	Order form with supporting quotes Payment BACS Approver – CFO/CEO/COO
	£10,001 to £25,000	Budget Holder plus Head Teacher/Chief Operating Officer for central purchases	Order form with supporting quotes Payment BACS Approver CFO/CEO/COO
	£25,001 to £100,000	Audit and Risk Committee Board of Directors	Order form, procurement documents Payment BACS Approver CFO/CEO/COO
	Over £100,001	Board of Directors (*)	Procurement and tender documentation Approver CFO/CEO/COO

Authorisation for BACS, Budget virements, bad debt write off and asset write off

Delegated responsibility	Value	Delegated Authority
Bank Account Transfers/BACS payment authorisation	Any	If transaction entered by Finance Team Leader, authorised by Finance Manager If transaction entered by Finance Manager, authorised by CEO/COO/CFO
Budget virements (all reported to Audit and Risk Committee)	Up to £25,000	CFO
	Over £25,001	Audit and Risk Committee
Bad debt write off	Up to £500	Head of School/CEO
	Over £500	Audit and Risk Committee
	Over DFE delegated limits described in Section 15 above	Secretary of State
Asset write off	Original cost up to £5,000	CFO
	Original cost over £5,000	Audit and Risk Committee
Timesheets for additional hours	Any	Budget holder
Unpaid leave requests	Any	Headteacher

Requirements for purchase quotes and other supporting documentation

Estimated value of goods, services or works	Delegated authority	Minimum number of Quotes/Tenders	Format of Quotes/Tenders	Records required	Contracts for Services Required
Up to £1,000	Budget holder	Comparative quotes not required but recommended, and purchaser must ensure best value	Written quotation where sought	Note to be made of source, name and amount of quotes obtained	No
Up to £5,000	Budget holder plus Headteacher or CEO				
£5,000 to £10,000	Budget holder plus Headteacher or CEO	3 to be obtained	Written quotation	Retain quotes	Yes if applicable. Signed by Headteacher or CEO
£10,001 to £25,000	Headteacher plus CEO	Minimum 3 to be obtained	Written quotation	Written quotations only, to be evaluated by Headteacher and CFO	Yes if applicable. Signed by Headteacher or CEO
£25,001 to £40,000	Audit and Risk Committee	Minimum 3 to be obtained	Written quotation	Written quotations only, to be evaluated by Headteacher and CFO	Yes if applicable. Signed by Headteacher or CEO
£40,001 to £100,000	Audit and Risk Committee	Minimum 3 to be obtained	**Mini tender** Process/Framework	Tender documents, to be evaluated by CFO/CEO and evaluation reviewed by Audit and Risk Committee	Yes if applicable. Signed by Headteacher or CEO
£100,001 to Find a Tender Limit	Board of Directors	Minimum of 3 to be obtained	Formal Tendering Process/Framework	Tender documents, to be evaluated by CFO/CEO and a member of the Audit and Risk Committee	Yes. Signed by Headteacher or CEO

Over Find a Tender Limit	Board of Directors	Advertisement of Tender	Formal Tendering Process	Tender documents, to be evaluated by CFO/CEO and a member of the Audit and Risk Committee	Yes. Signed by Headteacher or CEO

Appendix 3 – Self Employment Return

EMPLOYMENT ASSESSMENT FORM

The Inland Revenue has advised us that we have a duty to operate PAYE (Pay As You Earn) for all individuals whose terms of engagement constitute an employment, whether on a temporary, casual, part-time or permanent basis.

The fact that an individual is registered as self-employed does not necessarily mean the engagement with The White Hills Park Trust is one of self-employment.

The Inland Revenue has made it quite clear that it is our responsibility for determining the status and that if an incorrect decision is made, we will be liable to pay the tax and National Insurance which should have been deducted, together with interest for late payment and penalties.

Will you please arrange for the person you are going to engage to complete the following form. The worker should sign the form and you should countersign to acknowledge you agree the information provided, in respect of the engagement at the (Nottinghamshire County Council).

The Inland Revenue has made it quite clear that they will be randomly checking the completed forms and will, if they consider necessary, conduct interviews with the (Department Head) of the worker as well as the individual.

Your Full Name	
Your Address	
National Insurance Number	
Unique Tax Payer Ref:	
Full details of the service you have provided for us	
Duration of Engagement *Dates Required*	**From** **To**
State School and the name and telephone extension number of the person authorising the appointment	**The White Hills Park Trust** Bramcote College Moor Lane Bramcote Nottingham NG9 3GA TEL: 0115 9168900 Fax: 0115 9168901 Staff Member's Name:________________________________
Please attach copies of your contract or letters of appointment	

Question		Yes	No	Additional Information
1)	**Can The White Hills Park Trust specify when the work is to be carried out?**			
2)	**Can The White Hills Park Trust specify where the work is to be carried out?**			
3)	**Has The White Hills Park Trust a right to a say in the manner in which the work is carried out?**			
4)	**Is the basis of payment an hourly, daily, or weekly rate?**			
5)	**Is overtime payable?**			
6)	**Will expenses be paid?**			
7)	**Will The White Hills Park Trust be responsible for any unsatisfactory work you undertake (if no, please give details).**			
8)	**Will you be covered by The White Hills Park Trust Public Liability insurance for this work you undertake? (if no, please specify what cover you hold)**			
9)	**Are you required to undertake the work personally? (if no, please state what agreement has been reached with the department)**			
10)	**Does The White Hills Park Trust provide the major equipment for this work? (if no, please state what equipment you provide)**			

The above information is a true reflection of the engagement.

Signed (Contractor) ....

Engaging School ......

Appendix 4 – Charge Card: conditions of use acceptance form

Name: School Site: WHP Trust – [Academy/Department]

A Trust charge card with Lloyds bank has been issued to you on instruction from the Head Teacher or Head of Department. This card may have an individual transaction limit applied based on the operational requirements of your position.

Your Lloyds Visa Charge Card details are:

Monthly credit limit	[£XX]

Individual transaction limit	*To be determined. Where applicable, this will be communicated to you separately.*

As card holder, you are responsible for the safe custody and security of the card.

Before making any purchases, you must seek budget approval from the Head Teacher or budget holder. You may be asked to reimburse any transactions where prior agreement was not received.

All transactions must be prioritised based on the wider operational demands of the school, and to maintain the overall card limits across the school site.

Charge cards are to be used in exceptional circumstances for on-line or in-store purchases that cannot otherwise be sourced through the preferred supplier invoice route. Such transactions must be able to demonstrate that best value has been achieved by using this purchase method.

Please read the following, to confirm:

1. I will register my charge card with Lloyds Bank on receipt of my card, following the process as issued to me by the Trust Finance Team.

2. I will monitor all transactions to maintain my card limit, allowing for a safe contingency amount each month.

3. I will submit a Charge Card Purchase Form within 24 hours of use, along with a detailed receipt that confirms any VAT charges. A receipt must accompany all purchases.

4. I will only use the Trust Charge Card for school business purchases and not for any personal matter.

5. **I understand that the purchase of alcohol, including 0% alcohol, is not permitted under any circumstances**.
6. I will liaise with the Trust Finance Team to verify and examine all supplier options to ensure the charge card is only used where payment by invoice is not permitted.
7. I understand that my Charge Card details must not be saved or stored on any internet browser or website.
8. I understand that my Charge Card must not be used as a default payment for recurring subscriptions.
9. I will notify the Trust Finance Manager immediately should my card be lost or stolen.

I further understand that, should I not adhere to the above conditions, that the card facility is likely to be withdrawn, and I will be asked to return the card immediately.

By signing this form, I am accepting responsibility for the Lloyds Charge Card issued to me in my name, on behalf of the White Hills Park Trust.

Card Holder confirmation of Charge card acceptance

Signed: ______________________________ Date: _____________________

On behalf of the issuer at White Hills Park Trust

Signed: ______________________________ Date: _____________________

Position: Trust Finance Manager

You will receive a digital copy of the completed document.