



ESPRIT Financial Regulations Policy

Committee:	Trust Board
Approved on:	
Next review date:	October 2020

Associated documentation	
Academy trust funding agreement	2019/20
Academies Financial Handbook	2019
Academies Accounts Direction	2018/19

This document sets out the regulations for the ESPRIT multi academy trust



Introduction.....	4
Financial Planning	4
The budget cycle.....	4
Budget.....	4
Other Government Funding	5
Other Grants and specific funding.....	5
Virements.....	6
Revised Budget.....	6
Budget Forecast Return	6
Monitoring and review (including management accounts)	6
Independent checking procedures.....	6
Review of regularity	7
Annual accounts	7
Value for money statement	7
Audit arrangements.....	7
Work undertaken during accounting period.....	8
Work undertaken for the year end.....	8
Accounts Return	8
Document retention	8
Accounting system.....	9
System Access.....	9
Back-up Procedures	9
Transaction processing	10
Transaction reports	10
Reconciliations.....	10
Cash Management	10
Bank Accounts	10
Deposits	11
Payments and withdrawals	11
Administration.....	11
Petty Cash	12
Payments	12
Administration.....	12
E-procurement & Payments	12
BACS Payments	13
Investments	13
Objectives	14
Investment strategy.....	14
Reserves	15



Capital Reserves	15
Endowments	15
Payroll.....	16
Staff Appointments.....	16
Payroll Administration	16
Payments	16
Salary advances.....	17
Severance payments	17
Ex-gratia payments	17
Income.....	17
ESFA grants.....	17
Other grants	18
Optional Extras.....	18
INCOME.....	20
Before / After School Club.....	20
Lettings	20
Sundry income	20
Gift aid.....	21
Bad debts.....	21
Purchasing.....	21
Routine Purchasing.....	21
E-procurement	22
Orders	22
Orders below £10,000	23
Any order below £10,000 must be from approved suppliers. Wherever possible more than one quote must be obtained to ensure value for money. If only one quote is available it is at the discretion of the Academy Principal, Executive Business Manager or Executive Principal if this is acceptable.	23
Orders over £10,000 but less than £40,000	23
Orders over £40,000	23
Official Journal of the European Union.....	23
Trading with related or connected parties	23
Goods and services for private use.....	23
Forms of Tenders.....	23
Preparation for Tender	24
Invitation to Tender	24
Tender Acceptance Procedures.....	25
Tender Opening Procedures.....	25
Tendering Procedures.....	25
Insurance	25
Governors/Trustees Expenses.....	26
Gifts.....	26
Energy Management.....	27
Fraud	27
Whistleblowing.....	27

Leasing & Borrowing.....	27
Pooling of GAG.....	27
VAT.....	28
VAT 126 form.....	28
Fixed assets	28
Asset register	28
Security of assets.....	29
Disposals	29
Depreciation.....	29
Loan of Assets	30
Monitoring outcomes and reviews	30
Appendix 1.....	31
Statement of Regularity, Propriety and Compliance.....	31
Appendix 2.....	32
Gift and Hospitality Register.....	32
Appendix 3.....	33
Staff Roles & Segregation of duties	33

Introduction

1. The purpose of this manual is to ensure that the academy maintains and develops systems of financial control, which conform with the requirements both of propriety and of good financial management. It is essential that these systems operate properly to meet the requirements of our funding agreement with the Secretary of State for Education, through the Education Funding Agency (ESFA).
2. The academy trust must comply with the principles of financial control outlined in the Academies Financial Handbook. This policy expands on that. The Trust also has an accounting procedures and system manual which should be read and used by all staff involved with financial systems.
3. This policy serves as an adjunct to the scheme of delegation providing information on the day-to-day operations and practicalities forming from this financial policy.

Financial Planning

4. The academy trust prepares rolling three year budgets.

The budget cycle

5. The budget cycle is as follows:
 - Autumn term (Sept – Dec)
Implementation of current budget plan
Monitoring expenditure (continuous-monthly)
Reconciliation and closure of previous financial year
 - Spring term (Jan – Mar)
Monitoring and Reviewing of year's budget
Revised Budget where appropriate
Pre-planning new financial year
 - Summer term (Apr – Aug)
Planning for forthcoming year
Preparation and submission of financial budget plan
Review of current year's budget

All requirements of the ESFA, in particular relating to carry forward of unspent funds, will be taken into account in preparing and submitting the budget.

Budget

6. The Executive Business Manager is responsible for preparing and obtaining approval for the annual budget. The budget must be approved by the Executive Principal, Audit committee and the Trust board.

7. 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 should be a clear link between the development plan objectives and the budgeted utilisation of resources.
8. The budgetary planning process will incorporate the following elements:
 - forecasts of the likely number of pupils to estimate the amount of General Annual Grant
 - latest estimate of other ESFA funding e.g. pupil premium, Yr7 Catch-Up or other specific funds
 - review of other income sources available to the academy to assess likely level of receipts
 - review of past performance against budgets to promote an understanding of the academy costs
 - 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
 - all carry forward balances
 - any unspent grants from the previous financial year
 - any funds held in Trust
9. Comparison of estimated income and expenditure will identify any potential surplus or shortfall in funding. If shortfalls are identified, opportunities to increase income should be explored and expenditure headings will need to be reviewed for areas where cuts can be made. This may entail prioritising tasks and deferring projects until more funding is available. Plans and budgets will need to be revised until income and expenditure are in balance. If a potential surplus is identified, this may be held back as a contingency or alternatively allocated to areas of need in accordance with the Development Plan.
10. If there is a significant (over 10%) departure from the anticipated budget this will be escalated to the audit committee as part of the monthly management accounts procedure.
11. The approved budget is then entered onto the finance system at the start of the new financial year.

Other Government Funding

12. In addition to GAG funding from ESFA the trust may be awarded specific funding for other projects e.g. Condition Improvement Funds, Character Bid funding, Additional Special Educational Needs funding etc. This funding may be from the Department of Education or Local Authority. All government funding will be spent in accordance with the terms and conditions imposed, accurately recorded as government income (restricted) and audited externally annually.
13. The Executive Business Manager is responsible for recording income and expenditure for each grant, providing a reconciliation within the monthly management accounts.

Other Grants and specific funding

14. In addition to the GAG funding from the ESFA the academy/MAT and other government funding, the academy/MAT may be awarded additional grants from time to time relating to specific projects e.g. Sport England Funding, Football Foundation Funding, Charitable Grants etc. All applications for additional external funding must be approved and supported by the Board of Trustees. All external funding and grants will be spent in accordance with the terms and conditions imposed, accurately recorded as income specific to a certain project and audited externally annually.
15. The Executive Business Manager is responsible for recording income and expenditure for each grant, providing a reconciliation within the monthly management accounts.

Funds held in Trust

16. Where funds are held in trust the Executive Business Manager is responsible for ensuring accurate recording of the income and expenditure, as well as ensuring the funds are recognised separately as set out in the memorandum and articles.

Virements

17. Substantial virements shall be approved and minuted by the Audit Committee and should be within the agreed criteria and financial limits as per the scheme of financial delegation.
18. The Executive Business Manager is given delegated power to vire from one budget to another.

Revised Budget

19. Monitoring and analysis of the agreed budget should be carried out on a monthly basis by the Accounting Officer and Executive Business Manager and reports forwarded to the Board of Trustees. Where significant variations to the agreed budget are identified or where a number of substantial virements have been approved by the Audit Committee and or where significant staff changes have occurred in-year, then a Revised Budget should be prepared and approved by the Board of Trustees. This Revised Budget should then form the basis of analysis of all income and expenditure until the financial year end.

Budget Forecast Return

21. The approved budget must be submitted to ESFA by 31 July each year by the Executive Business Manager. The Executive Business Manager is responsible for establishing a timetable, which allows sufficient time for the approval process and ensures that the submission date is met.

Monitoring and review (including management accounts)

22. Monthly reports are prepared by the Executive Business Manager. The report includes
 - Income & Expenditure against Budget
 - Forecast of spend to end of academic year
 - Balance Sheet
 - Cash Flow forecast
23. Any potential overspend against the budget must in the first instance be discussed with the Executive Principal.
24. The monthly reports are shared with the Executive Principal, Academy Principal, Chair of Trustees, Chair of Audit Committee, and are made available to all trustees electronically.

Independent checking procedures

25. The Financial accounts will be checked by the External auditor at least once per financial year.

26. The auditors will produce a report to the Audit committee and the Chair of Trustees.

Review of regularity

27. The Executive Principal (in their role as Accounting Officer) reviews the following documents termly to ensure the academy trust is working within the boundaries of regularity and propriety:
- reviews management accounts
 - reviews compliance against the scheme of delegation
 - reviews transactions for evidence of connected party transactions
 - value for money practice
28. The Accounting Officer has delegated the following responsibilities to the Executive Business Manager or Compliance Officer as listed below:
- adherence to tendering policies – Executive Business Manager
 - review of transactions confirming in line with delegated authorities as set out by the Academies Financial Handbook – Executive Business Manager
 - review of trustees/governors' minutes – Compliance Officer

Annual accounts

30. The academy trust must prepare annual audited financial statements for the accounting period to 31 August.
31. The accounts are prepared in house by the Executive Business Manager with support from outsourced Accountants as and when required.
32. The accounts are then submitted as follows:
- by 31 December – to ESFA
 - by 31 January – published on our own website
 - by 31 May – to Companies House

Value for money statement

33. As part of the annual accounts the trust must include 3 focussed examples of value for money.
34. The Executive Business Manager is responsible for collating the examples which are then confirmed by the audit committee.

Audit arrangements

35. External auditors must be appointed in accordance with the Academies Financial Handbook.
36. The Executive Business Manager is responsible for managing the audit process, by liaising with the auditors, arranging the timetable for accounts and audit completion and ensuring deadlines are met.

Work undertaken during accounting period

37. The Executive Business Manager is responsible for the following tasks to be undertaken during the year to facilitate a smooth audit process:
- reviewing the structure of the trial balance
 - maintaining a fixed asset register
 - asset depreciation charges
 - maintaining income and expenditure records (including filing of invoices)
 - reviewing aged debtors for any provisions required
 - ensuring any related and connected party transactions are reported to the ESFA using their reporting requirements and are in line with the Academies Financial Handbook
 - control account reconciliations (bank, wages, debtors, creditors)
 - maintaining a record of meeting attendance
 - Monitoring & reporting to the Accounting Officer and Board of trustees

Work undertaken for the year end

38. The Executive Business Manager is responsible for the following tasks to be undertaken at the end of the year to facilitate a smooth audit process:
- stock take and including of year end stock value
 - prepayments for IT licenses
 - prepayments or accruals for grant income
 - control account reconciliations (bank, wages, debtors, creditors)
 - close down of the purchase ledgers
 - close down of the Sales ledgers and aged debtors
 - pension valuations
 - Pension Audit

Accounts Return

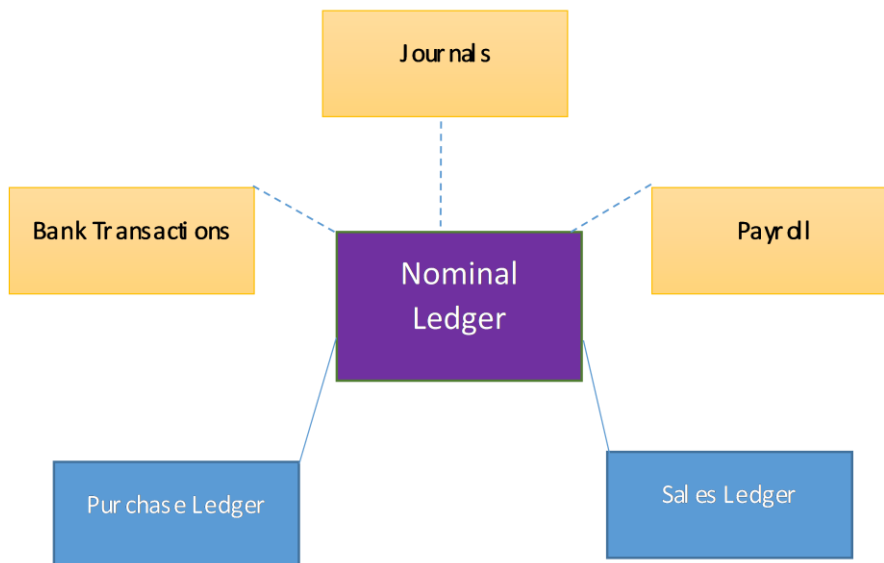
39. The academy trust must prepare an annual accounts return for the accounting period to 31 August, which is submitted to the ESFA by 31 January.
40. The accounts return is prepared in house by the Executive Business Manager with the support as and when required by the accountants.

Document retention

41. Documents are retained for the following amount of time; these can be either electronic or paper records:
- Finance records – current year plus preceding 6 years
 - Supply cover insurance – current year plus preceding 6 years
 - Payroll and travel records – current year plus preceding 6 years
 - Personnel records – 5 years after an employee has left
 - All student files until the student reaches the age of 21

Accounting system

42. All the financial transactions of the academy trust must be recorded into PS Financials, the computerised financial information accounting system. This system is operated by the Office and Administration teams and consists of:



System Access

43. Access to the system is password restricted to the Executive Business Manager, Senior Administration and Finance Officers, Administration Teams and other authorised users within the academy as deemed necessary.
44. When passwords are changed the new password should be placed in a sealed envelope and passed to the Senior Administration and Finance Officer of the Academy location to keep in the safe. The Executive Business Manager is responsible for implementing a system which ensures that passwords are changed regularly, this is completed using the software parameters of the PS Financials system.

Back-up Procedures

45. As the PS Financials system is operated using the Cloud all back-ups of the system are held off site at PS Financials Cloud storage facility. These are backed up daily as part of the contract and comply with current data protection regulations.
46. The disaster recovery plan explains what to do in the event of loss of accounting facilities or financial data. Copies are held in the fire proof container located at Northwood Broom Academy

ESPRIT office. The latest month end nominal reports from PS Financials are stored in this container and are updated monthly.

Transaction processing

47. All transactions input to the accounting system must be authorised in accordance with the scheme of delegation – either by order or signing of invoice.
48. All journal entries are documented on the journal form and are authorised in accordance with the latest scheme of Financial Delegation, prior to being input to the accounting system.
49. Bank transactions are input by the Administration Team and reviewed by the Executive Business Manager dependant on the transaction.

Transaction reports

50. The Executive Business Manager reviews the following system reports to ensure that only regular transactions are posted to the accounting system:
 - the monthly audit trail reports
 - management accounts summarising expenditure and income against budget at budget holder level

Reconciliations

51. The Executive Business Manager is responsible for ensuring the following reconciliations are performed each month, and that any reconciling or balancing amounts are cleared:
 - sales ledger control account
 - purchase ledger control account
 - payroll control account
 - VAT control account
 - all suspense accounts
 - bank balance per the nominal ledger to the bank statement
52. The Executive Principal signs all reconciliations as evidence of review.
53. Any unusual or long outstanding reconciling items are brought to the attention of the Executive Business Manager and dealt with according to the bad debt limits in this manual.

Cash Management

Bank Accounts

54. The following procedures must be followed when opening a bank account and operating it:
 - the trust is responsible for selecting the banking institution and negotiating the terms and conditions
 - the trust board must authorise the opening of all bank accounts
 - the academy/MAT will ensure that in the event of changes to key personnel or trustees, signatories will be changed immediately and the bank notified. Any on-line access to banking will also be removed

- terms of arrangements, including cheque signatories or BACS authorisations and the operation of the accounts must be formally recorded and agreement minuted
- the trust must inform the bank, in writing, that their accounts must not become overdrawn
- the trust must ensure there are sufficient funds to cover large payments

Deposits

55. cash and cheque deposits must be entered on a copy paying-in slip or listed in a supporting document with the following details:
- the amount of the deposit
 - a reference (for example the number of the receipt or the name of the debtor)
56. The Administration Team is responsible for updating the accounting system (within 5 working days) for deposits placed.

Payments and withdrawals

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

ESPRIT Multi Academy Trust account

- Executive Principal
- Academy Principal
- Executive Business Manager

Academy Imprest Accounts (Debit Card Transactions only)

- Academy Principal
- Senior Administration and Finance Officer
- Executive Business Manager

58. This provision applies to all accounts, public or private, operated by or on behalf of the trust board of the Multi Academy Trust / Academy including funds held in trust.
59. The Administration Team is responsible for updating the accounting system (within 5 working days) for these transactions.

Administration

60. The Executive Business Manager ensures 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's cash book
 - reconciliations are prepared by the Finance Department
 - reconciliations are subject to an independent monthly review carried out by either one of the Executive Business Manager / Executive Principal or in his/her absence the Chair of the Audit Committee.
 - adjustments arising are dealt with promptly

Petty Cash

61. The academy trust maintains a bank balance of £1000 for the purchase of minor items, which is held in the individual academy bank accounts. An amount of £50 may be held at any time in the office safe and is the responsibility of the Senior Administration and Finance Officer at that location.
62. The petty cash float must not be used for:
 - cashing personal cheques
 - paying staff loans

Payments

63. In the interests of security, petty cash payments are limited to £25. Payments are made on production of a valid till receipt or other proof of payment and are subject to the same authorisation procedures as purchases from the bank account.

Administration

64. The petty cash float is maintained on the finance system and the float is only reimbursed from the bank account.
65. The bank account is only reimbursed from the main ESPRIT bank account, no direct credits should be made to these academy bank accounts.
66. If any petty cash float is held it is reconciled monthly by Senior Administration and Finance Officer. The reconciliation is then reviewed by the Executive Business Manager and initialled as evidence of review as part of the month end process
67. The Executive Business Manager carries out a spot check of the petty cash float once a term, if any is held.

E-procurement & Payments

68. The Academy debit card (Lloyds) is used only when it is not practical to use the purchase order system. It is used mostly for internet purchases and to buy refreshments for meeting etc.
69. The cards are kept in the safe and is only used by the person named on the card:
70. Any department wishing to make a purchase on debit card must complete an order form and pass this to the Senior Administration and Finance Officer to make the purchase. All order forms detailing the purchase must be signed in accordance with the scheme of financial delegation.
71. Occasionally the debit card is used to purchase small items or to fund Petty Cash, where it is not possible to order this elsewhere. This must be recorded on the correct template and countersigned by the Senior Administration and Finance Officer.
72. The account is reconciled each month by the Senior Administration and Finance Officer as part of the month end financial process, using the Finance system.

BACS Payments

73. On receipt of any non-order invoice, the budget holder signs the invoice, in adherence to the scheme of delegation, to signify:
 - the delivery note (if one is available) has been checked
 - the delivery is of correct quantity, quality and price
 - it has not been previously paid
 - funds are available in the relevant budget
 - VAT chargeability on qualifying expenditure is shown
74. On receipt of a purchase ordered invoice, the Senior Administration and Finance Officer will input the invoice directly to the PS Financials system following the system instructions as all orders entered onto this system have already been pre-authorised.
75. The payment is prepared by the Executive Business Manager using the PS Financials system.
76. The BACS payment report from PS Financials is produced, and a random selection of payments are checked for each academy location.
77. The BACS payment is then checked and signed by the Executive Principal or their deputy and transferred from the bank account using the commercial banking system (Lloyds).
78. Two authorised users of the commercial banking online system must authorise any payments or transfers from the main bank account.
79. Normally, BACS payments to suppliers are processed within a month of receipt, or in line with the supplier invoice terms, although every effort is made to ensure the academy trust benefits from early payment discounts.
80. The Administration Team ensures that evidence is kept of the employment status test criteria applied, when dealing with payments to individuals. Where an individual has been assessed as self-employed, the Admin Team should request that the individual states his self-employment reference number on any invoice issued to the school.

Investments

81. Investments are made in accordance with the following written procedures approved by the trust board.
82. The Trustees will meet their duties under the Academy's Articles of Association and Academies Financial Handbook issued by the EFA to invest monies surplus to operational requirements in furtherance of the Academy's charitable aims and to ensure that investment risk is properly and prudently managed.
83. The Academy's Articles gives Trustees the power "to expend the funds of the Trust in such manner as they shall consider most beneficial for the achievement of the Objects and to invest in the name of the Trust such part of the funds as they may see fit and to direct the sale or transposition of any such investments and to expend the proceeds of any such sale in furtherance

of the Objects.”

The Board of Trustees has responsibility for the Trust’s finances and must approve *any investments made to manage, control and track financial exposure, and ensure value for money; to review the trust’s investments and this finance policy on a regular basis.*

84. The Executive Business Manager is responsible for producing reliable cash flow forecasts as a basis for decision making. They are responsible for making investment decisions that comply with this Policy and for providing sufficient management information to the board of trustees so it can review and monitor investment performance.

Objectives

The investment objectives are:

- to achieve best financial return available whilst ensuring that security of deposits takes precedence over revenue maximisation.
- Only invest funds surplus to operational need based on all financial commitments being met without the MAT bank account becoming overdrawn.
- By complying with this policy, all investment decisions should be exercised with care and skill and consequently be in the best interests of the trust, commanding broad public support.

Investment strategy

85. Investment risk will be managed through asset class selection and diversification to ensure that security of deposits takes precedence over revenue maximisation.

For selection, assets will only be considered with banking institutions which have credit ratings assessed by Fitch and or Moody to show good credit quality.

To manage the risk of default, deposits should be spread by banking institution and be subject to a maximum exposure of £500,000 with any PRA authorised institution by the Bank of England (refer to Financial Conduct Authority (FCA). Whilst this exceeds the protection limit of £75,000 provided by the FCA it is accepted that it is not always practicable to find a sufficient number of investments of this size that meet the prudent criteria outlined in this policy.

Spending and liquidity policy

Decisions on how much to invest and how long to invest for, will be based on operational requirements, demonstrated by cash flow forecasts produced by the Executive Business Manager. The cash flow forecasts will take account of the annual budget and spending plans approved by the trust board and updated on a monthly basis.

A sufficient balance must be held in the current account so that the MAT financial commitments can always be met without the bank account going overdrawn. The size of the balance will be determined by a forecast of future need and kept under review. Investments for a fixed term should not normally exceed one year in order to provide

flexibility for the following year's plans, unless a clear rationale is provided for exceeding one year to the benefit of the Academy.

Monitoring and review

The Academy has authorized signatories, two of which are required to sign instructions to the deposit taking institution.

The Executive Business Manager will monitor the cash position and cash flow forecast and report investments held and the performance of investments against objectives to the Audit Committee at appropriate intervals, depending on the terms of the investments. For example, if investments are held one year then an annual report is appropriate.

86. All investments are 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.

Reserves

87. Any overall surpluses or deficits (reserves) at the end of the year are carried over to the following year.
88. The Executive Principal as Accounting Officer must inform ESFA immediately if a deficit is anticipated.
89. If the academy trust is anticipating a deficit at the end of any financial year, the trust board and Executive Principal have a responsibility to ensure action is taken at the earliest opportunity to address this issue. The trust board must ensure that a recovery plan is submitted and approved by the ESFA.
90. The academy trust undertakes to ensure that a contingency reserve of 2% of the previous year's total GAG is kept.

Capital Reserves

91. Any overall surpluses at the end of the year are carried over to the following year.
92. It is the responsibility of the Executive Business Manager to keep accurate records of the capital funds, especially where grants have been received for capital projects.

Endowments

93. The Executive Business Manager is responsible for accounting for the transactions within the endowment fund.
94. Any transactions are in line with the memorandum and articles.

Payroll

Staff Appointments

95. All staff appointments will be made in line with the Scheme of Delegation.
96. The trust board completes an annual review of Executive Pay in accordance with the trusts appraisal process. Other benefits are also taken into account in addition to salary to ensure this is reasonable, defensible and proportionate.
97. The Senior Administration and Finance Officer is responsible for obtaining the relevant pre employment checks and ensuring these are retained on an individual employee master file which includes:
 - Salary / level
 - bank account details
 - taxation status
 - personal details
 - any deductions or allowances payable
 - other legal and relevant details

Payroll Administration

98. Payroll is administered through the academy trust's payroll provider with all staff being paid monthly in arrears based on the payroll providers current schedule of salary payments. All payments to staff are by BACS transfer.
99. Updates to HR Records can only be completed by the Senior Administration and Finance Officer with the authorisation of the Academy Principal on the correct documentation, this includes payments for additional hours worked.
100. All additional hours must be pre-agreed by the Academy Principal and will not be entered onto the MYVIEW system without a signature, all additional hours are paid in arrears monthly.
101. Each Senior Administration and Finance Officer must update the payroll online system MYVIEW when staff changes occur, including sickness and additional hours. This automated system will update the payroll immediately.
102. No payments for work undertaken will be made other than via the payroll system.
103. The Senior Administration and Finance Officers will follow the timetable specified by the payroll provider for updating key information onto the MYVIEW system.
104. In the event of a change of payroll provider mid-year this will result in an addendum to this part of the policy.

Payments

104. The Payroll provider will provide an electronic report listing of all staff payments at least 5 working days before the payroll date. This must be checked by the Executive Business Manager for

exceptions prior to the BACS authorisation form being signed for the full payroll amount by the authorised representative from ESPRIT in line with the current scheme of delegation.

105. The payroll system automatically calculates the deductions due from payroll to comply with current legislation. The major deductions are for tax, National Insurance contributions and pensions. The amounts payable are summarised on the gross to net pay report and the payroll provider deducts this amount directly from the MAT bank account.
106. The Executive Business Manager selects at least three employees at random each month and checks the calculation of gross to net pay to ensure that the payroll system is operating correctly. The check is recorded and available for checking by the Accounting Officer.
107. After the payroll has been processed the nominal ledger will be manually updated using a journal produced by the payroll provider. Postings will be made both to the payroll control account and to individual cost centres. The Executive Business Manager should review the payroll control account each month to ensure the correct amount has been posted from the payroll system, individual cost centres have been correctly updated and to identify any amounts posted to the suspense account.
108. Annually, the Senior Administration and Finance Officer checks each member of staff that the gross pay per the payroll system agrees to the contract of employment held on the personnel records in the Academy office/Management information system.

Salary advances

109. The trust does not award salary advances.

Severance payments

110. The academy trust is able to self-approve the non-contractual element of severance payments up to £50,000. A business case must be presented before agreeing a payment, using the form provided by ESFA on Gov.uk.
111. Where the non-contractual element is on or over £50,000 prior approval from ESFA must be sought.
112. The Accounting Officer must sign off and review each business case.

Ex-gratia payments

113. Any ex-gratia payments must be submitted to ESFA for prior approval.

Income

ESFA grants

114. The main sources of income for the academy are the grants from the ESFA. The receipt of these sums is monitored directly by the Executive Business Manager who is responsible for ensuring that all grants due to the academy are collected.

Other grants

115. The receipt of these sums is monitored directly by the Executive Business Manager who is responsible for ensuring that all grants due to the academy are collected.

Optional Extras

116. The trust does not charge for national curriculum activities as per the terms of the Education Act 1996. Charges are made for some activities that are known as “optional extras”, these include education provided outside of school time that is not part of the National Curriculum and transport that is not required to take the pupil to school or to other premises for educational purposes only.

In calculating the cost of optional extras an amount may be included in relation to:

- Any materials, books, instruments, or equipment provided in connection with the optional extra;
- Non-teaching staff;
- Teaching staff engaged under contracts for services purely to provide an optional extra.

117. We ensure that any charge made in respect of individual pupils must not exceed the actual cost of providing the optional extra activity, divided equally by the number of pupils participating. It does not, therefore, include an element of subsidy for any other pupils wishing to participate in the activity whose parents are unwilling or unable to pay the full charge.

118. In cases where a small proportion of the activity takes place during school hours the charge will not include the cost of alternative provision for those pupils who do not wish to participate.

119. Participation in any optional extra activity will be on the basis of parental choice and a willingness to meet the charges. Parental agreement is therefore a necessary pre-requisite for the provision of an optional extra where charges will be made.

Voluntary Contributions

120. We are aware that nothing in legislation prevents us from asking for voluntary contributions for the benefit of the academy or any academy activities. If any activity cannot be funded without voluntary contributions, the trust board or Academy Principal will make this clear to parents at the outset; also we make it clear to parents that there is no obligation to make any contribution.

121. Within the ESPRIT Multi Academy Trust no child will be excluded from an activity simply because his or her parents are unwilling or unable to pay. If insufficient voluntary contributions are raised to fund a visit, then it may be cancelled and we make this clear to parents. If a parent is unwilling or unable to pay, their child is still to be given an equal chance to go on the visit. We ensure that when making requests for voluntary contributions to academy funds, parents are not made to feel pressurised into paying as it is voluntary and not compulsory.

122. We reserve the right to cancel any planned activity if there has not been enough funding raised to cover costs.

123. Any payments collected on behalf of charitable organisations are directly credited to the organisation, unless in exceptional circumstances where this is not possible. If any income is processed via the academy bank it is also clearly shown on the financial systems as income and expenditure.

Music Tuition

124. Although the law states that all education provided during school hours must be free, music lessons are an exception to this rule. Charges may be made for teaching either an individual pupil or groups of any appropriate size (provided that the size of the group is based on sound pedagogical principles) to play a musical instrument or to sing.

Transport

125. We are aware that we cannot charge for transporting a registered pupil to or from the school premises, where a Local authority has the statutory obligation to provide transport not for transporting registered pupils to other premises where the governing body or local authority has arranged for pupils to be education.

Trips

126. A lead member of staff must be appointed for each trip to take responsibility for the collection of sums due. The teacher must prepare a record for each student intending to go on the trip showing the amount due. A copy of the record must be given to the Academy Office.
127. Students should make payments to the Academy via Parent Pay online system.
128. Cash is only accepted in extremely unusual situations with the prior approval of the Executive Business Manager. A receipt must be issued for any cash collected and the value of the receipt and the number of the receipt recorded against the student making the payment.
129. The academy office should maintain an up to date record for each student showing the amount paid and the amount outstanding. This record should be sent to the teacher on a weekly basis and the teacher is responsible for chasing the outstanding amounts.
130. Trips should be run at cost price, although allowance can be made for administrative fees and additional staff cover. Any surplus greater than £10 per pupil is redistributed to parents. If the academy decides to subsidise the trip the amount of subsidy must be approved by the Academy Principal in advance of the booking being made and this needs to be in line with the scheme of delegation and notified to the audit committee.
131. Transport provided in connection with an educational visit cannot be charged for.

Non-residential Activities

132. If 50% or more of the time spent on the activity occurs during school hours. It is deemed to have taken place during school hours. Time spent on travel counts in this calculation if the travel itself occurs during school hours. School hours do not include the break in the middle of the day.
133. Where less than 50% of the time spent on an activity falls during school hours, it is deemed to have taken place outside school hours. For example, an excursion might require pupils to leave school an hour before the school day ends, but the activity does not end until late in the evening.

Residential Activities

134. If a pupil is staying overnight on a residential activity the academy is allowed to make a charge for board and lodgings. If a parent is receiving income support aligned with the eligibility criteria for free school meals, or if a parent is already claiming free school meals, they can contact the school for an exemption from paying for board and lodgings via the academy office.

INCOME

If cash payments

133. Cash payments must be reconciled on a daily basis by the Administration Team to the income records using the correct template. All cash is kept in the safe prior to weekly banking. The Administration Team must reconcile the weekly banking sheet to actual receipts banked.

If electronic collection

134. The weekly bank credits are reconciled to the Parent-Pay reports in the first instance by the Administration Team. Monthly checks are undertaken by the Senior Administration and Finance Officer and cross referenced to a sample of individual pupils.

Before / After School Club

135. All BASC sessions are booked and paid in advance using Parent Pay
136. Charges for 2019/20 Academic Year are shown in the Before & After School policy.
137. Childcare Voucher payments are reconciled on a weekly basis to the bank statement by the Administration Team. Monthly checks are undertaken by the Senior Administration and Finance Officer, this forms part of the month end checklist.

Lettings

142. The Senior Administration and Finance Officer is responsible for maintaining records of bookings of sports facilities and for identifying the sums due from each organisation. Payments must be made in advance for the use of facilities.
143. Details of organisations using the sports facilities will be held by the Academy Office who will establish a sales ledger account and produce a sales invoice from the PS Financials accounting system.
144. Copies of the organisations up to date relevant Public Liability, DBS, indemnity, insurance and qualifications (where relevant e.g. H&S, First Aid, Instructor etc.) are kept with the Letting Agreements and are reviewed at least annually by the Executive Business Manager.

Sundry income

145. Income from other sources (for example educational consultancy) is priced in consultation with the Executive Business Manager. The transaction must not be undertaken until the price has been agreed and the customer has been assessed for ability to pay in accordance with the agreed Consultants Policy. The Executive Principal approves all credit agreements.

Gift aid

146. To ensure the academy trust, in its position as an exempt charity, receives all the monies it is entitled to the Executive Business Manager:
- reconciles income against records to confirm expected amounts have been received by the donor
 - ensures the tax reclaimable from HMRC has been obtained and any relevant business use deductions have been made.

Bad debts

147. The academy trust expects all invoices to be paid in full, either on or before their due date.
148. The academy trust chases all monies due, and those that have not been paid within 7 days of an invoice being issued, by text, telephone and letter.
149. If no response within 21 days a small claims court order is arranged by the Senior Administration and Finance Officer.
150. If the debt remains unrecoverable after 3 months, or it becomes clear that the debt will not be repaid, the Senior Administration and Finance Officer submits a report to the Academy Principal for approval of write off.
151. Bad debts can only be written off in line with the scheme of delegation agreed levels.

Purchasing

151. The academy trust must achieve value for money on all purchases. A large proportion of our purchases are paid for with public funds and we need to maintain the integrity of these funds by following the general principles of:
- Probity, it must be demonstrable that there is no corruption or private gain involved in the contractual relationships of the academy
 - Accountability, the academy is publicly accountable for its expenditure and the conduct of its affairs
 - Fairness, that all those dealt with by the academy are dealt with on a fair and equitable basis

Routine Purchasing

152. Budget holders will be informed of the budget available to them at least one month before the start of the academic year. It is the responsibility of the budget holder to manage the budget and to ensure that the funds available are not overspent. Data detailing actual expenditure and committed expenditure (orders placed but not paid for) against budget will be supplied to each budget holder each month. Budget holders will be able to monitor data relating to their own budget areas on a monthly basis via reports from the on line financial information system.
153. In the first instance a supplier should be chosen from the list of approved suppliers maintained by the Academy offices. A quote or price must always be obtained before any order is placed. If the budget holder considers that better value for money can be obtained by ordering from a supplier not on the approved supplier list, the reasons for this decision must be discussed and agreed with the Academy Principal. Copies of all quotes must be attached to the order form.

E-procurement

154. Any department wishing to make a purchase on debit card must complete an official order form in the usual manner and pass this to the Senior Administration and Finance Officer, or Admin staff to make the purchase. All order forms detailing the purchase must be signed in line with the scheme of delegation.
155. Occasionally the debit card is used to purchase small items or to fund Petty Cash, where it is not possible to order this elsewhere. This must be recorded and countersigned by the Senior Administration and Finance Officer using the correct form.

Orders

156. All orders must be made, or confirmed, in writing using an official order form, stocks are available to all staff within each academy and are available on the online storage locations for “master” documents. Orders must bear the signature of the budget holder and must be within the limits set out in the scheme of financial delegation. Orders must be forwarded to the Academy office where the Administration Team will place the order with the supplier.
157. Approved orders will be recorded in the purchase order module of the financial information system which allocates a reference number and commits expenditure. Orders will be dispatched to the supplier by email from the Administration Team.
158. On receipt of goods or services the academy Administration Team must undertake a detailed check of the goods received against the delivery note and raise a goods received note (GRN) on the finance system and file the order documentation in line with filing instructions. Discrepancies should be discussed with the supplier of the goods without delay.
159. If any goods are rejected or returned to the supplier because they are not as ordered or are of substandard quality, the Senior Administration and Finance Officer should be notified. The Senior Administration and Finance Officer will keep a central record of all goods returned to suppliers at each academy.
160. All invoices should be sent to the Senior Administration and Finance Officer. Invoice receipt will be recorded by Senior Administration and Finance Officer (and the invoice scanned) into the Financial Information System purchase ledger module.
161. The budget holder must make a detailed check of any non-order invoices to the delivery note and these documents must be attached to the invoice before it is sent back to the Senior Administration and Finance Officer. Budget holders must undertake these checks without undue delay and in any case within 7 days of invoice receipt.
162. If a budget holder is pursuing a query with a supplier the Senior Administration and Finance Officer must be informed of the query and periodically kept up to date with progress (at least weekly).
163. At the end of each month the Senior Administration and Finance Officer will produce a list of outstanding invoices from the purchase ledger and this list together with supporting documentation will be reviewed by the Academy Principal and Executive Business Manager.
164. BACS payments are input by the Executive Business Manager and authorised on-line by two signatories in accordance with the commercial banking system and scheme of delegation.

Orders below £10,000

Any order below £10,000 must be from approved suppliers. Wherever possible more than one quote must be obtained to ensure value for money. If only one quote is available it is at the discretion of the Academy Principal, Executive Business Manager or Executive Principal if this is acceptable.

Orders over £10,000 but less than £40,000

165. At least three quotations should be requested for all orders between £10,000 and £40,000 to identify the best source of the goods/services. Written details of quotations obtained should be prepared and retained by budget holders for audit purposes. Telephone quotes are acceptable if these are evidenced and faxed/Emailed confirmation of quotes has been received before a purchase decision is made and made in accordance with value for money principles. If three quotations have been requested but have not been received the Academy Principal and the Budget holder must agree which provider to use and evidence of the request must be kept for audit purposes.

Orders over £40,000

166. All goods/services ordered with a value over £40,000, or for a series of contracts which in total exceed £40,000 must have three written quotations and be pre-agreed by the trust board. Exceptions to this are PFI, which runs until 2025 and any other pre-conversion contracts that are in place.

Official Journal of the European Union

167. Purchases over the current OJEU threshold will be subject to formal tendering procedures, unless this is updated when the United Kingdom exits the European Union, when we will follow the legislation agreed as part of this negotiation.

Trading with related or connected parties

168. An annual review is taken of the pecuniary/business interests of all staff, governors, trustees and members. Staff are reminded regularly to inform the Academy office if their pecuniary/business interests change, and at every meeting of governors, trustees and members any disclosure of any pecuniary/business interest are recorded. Where a pecuniary/business interest has been disclosed the Executive Business Manager is informed, and checks this against the current approved supplier list if this is available and applicable.

169. Prior to any trading with related parties authorisation is obtained from the ESFA. Any transactions of this nature are also reported to the trust board.

170. The pecuniary / business interest register is presented to the Audit Committee annually, and again in the event of a significant change – for example with Key management personnel.

Goods and services for private use

176. No goods are ordered or services provided to include any elements of private use by members, trustees, governors and staff.

Forms of Tenders

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

- **Open Tender:** This is where all potential suppliers are invited to tender. The budget holder must discuss and agree with the Executive Business Manager how best to advertise for suppliers e.g. general press, trade journals or to identify all potential suppliers and contact directly if practical. This is the preferred method of tendering, as it is most conducive to competition and the propriety of public funds.
- **Restricted Tender:** This is where suppliers are specifically invited to tender. Restricted tenders are appropriate where:
 - there is a need to maintain a balance between the contract value and administrative costs,
 - a large number of suppliers would come forward or because the nature of the goods is such that only specific suppliers can be expected to supply the academy's requirements,
 - the costs of publicity and advertising are likely to outweigh the potential benefits of open tendering.
- **Negotiated Tender:** The terms of the contract may be negotiated with one or more chosen suppliers. This is appropriate in specific circumstances:
 - the above methods have resulted in either no or unacceptable tenders,
 - only one or very few suppliers are available,
 - extreme urgency exists,
 - additional deliveries by the existing supplier are justified.

Preparation for Tender

178. Full consideration should be given to:

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

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

180. A tender brief must always be prepared and is reviewed by the Executive Business Manager.

Invitation to Tender

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

182. An invitation to tender should include the following:

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

- form of response
- dates for decision and work to be delivered

Tender Acceptance Procedures

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

Tender Opening Procedures

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

- For contracts up to £100,000 - two of the budget holder, The Executive Business Manager
- For contracts over £100,000 – the Executive Principal or the Executive Business Manager plus a member of the Audit Committee.

185. A separate record details the names of the firms submitting tenders and the amount tendered. The record is signed by both people present at the tender opening.

Tendering Procedures

186. The evaluation process should involve at least two people. Those involved should disclose all interests, business and otherwise, that might impact upon their objectivity. If there is a potential conflict of interest, then that person must withdraw from the tendering process.

187. 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.

188. Full records should be kept of all criteria used for evaluation and for contracts over £40,000 a report should be prepared for the Audit Committee highlighting the relevant issues and recommending a decision. For contracts under £40,000 the decision and criteria should be reported to the Audit committee.

189. The accepted tender should be the one that is economically most advantageous to the academy. All parties are then informed of the decision.

Insurance

190. The Executive Business Manager reviews insurance arrangements annually. They ensure that the sums insured are commensurate with the risks and include cover for academy trust property when off the premises.

191. We have opted in to the Department for Education's Risk Protection Arrangements (RPA)

192. Budget holders must ensure all valuable are kept as secure as is reasonably practicable, and under lock and key wherever possible when not being used in a supervised manner.

193. The first £500 of replacement has to be funded by the department concerned as no budget is held centrally. Items under £500 will receive no insurance pay out and it is up to the department concerned as to whether the item is replaced or not.

Governors/Trustees Expenses

194. All governors/Trustees of this academy trust are entitled to claim the actual costs, which they incur as follows:
- childcare or baby-sitting allowances (excluding payments to a current/former spouse or partner)
 - cost of care arrangements for an elderly or dependent relative (excluding payments to a current/former spouse or partner)
 - the extra costs they incur in performing their duties either because they have special needs or because English is not their first language
 - the cost of travel relating only to travel to meetings/training courses at a rate of 45 pence per mile which does not exceed the specified rates for school personnel
 - travel and subsistence costs, payable at the current rates specified by the Secretary of State for the Environment, Transport and the Regions, associated with attending national meetings or training events, unless these costs can be claimed from the any other source
 - telephone charges, photocopying, stationery, postage etc.
 - any other justifiable allowances
195. The Trust board and the Governing Body acknowledges that:
- Governors/Trustees are not to be paid attendance allowance
 - Governors/Trustees are not reimbursed for loss of earnings
196. Governors/Trustees wishing to make claims under these arrangements, must complete a claims form from the Executive Business Manager together with the relevant receipts. The form must be submitted to the Academy within two weeks of the date when the costs were incurred, when they will be submitted for approval by the Chair of Governors/Trustees to be presented to the Audit Committee for final approval.
197. Claims will be subject to independent audit and may be investigated by the Chair of Trustees (or Chair of Audit Committee in respect of the Chair of Trustees) if they appear excessive or inconsistent.

Gifts

198. Ordinarily such gifts should be rejected, unless they are of negligible value (e.g. diaries, mugs, calendars). However, any individual gifts or hospitality in excess of £25 are reported to the Executive Principal (Accounting Officer) in order to protect the individual receiving the gift. This is particularly important where the person receiving the gift is a budget holder, has the ability to influence purchasing decisions or regularly receives reimbursement from the academy for items other than travel expenses.
199. Gifts that have been reported are entered onto the gifts and hospitality register by the individual receiving the gift and are alerted to the Senior Administration and Finance Officer at Academy level who then shares this information centrally.

Energy Management

200. Grove, Hamilton and Northwood Broom Academies are part of Stoke on Trent PFI contract and as a result all energy and water costs are paid through this contract, however, the following rules will still be followed, and will relate to any academy joining the trust that is not part of the PFI contract.
201. The Sites Manager is responsible for recording, monitoring and analysing water, gas and electricity consumption on a monthly basis. Meters should be checked before authorising any invoices from the utilities providers where it is possible to do this (Outside of PFI). Any discrepancies or unusual readings should be raised with the Executive Business Manager immediately.
202. The Sites Manager ensures that the school's heating system is operated and run as efficiently as possible.
203. The Sites Manager ensures that the school is purchasing energy at the most competitive prices available where it is possible to do this (Outside of PFI).
204. All staff have the responsibility to work in an energy efficient manner at all times (e.g. turning off computers, lights and heating when not required).

Fraud

205. The trust does not tolerate fraud. Where instances of fraud are found the Executive Principal will notify the ESFA.

Whistleblowing

206. The Academy Trust has a confidential reporting policy which is adhered to at all times.

Leasing & Borrowing

207. The Academy can enter into operating leases, not relating to land or buildings, with approval from the Trust board and in accordance with the scheme of delegation.
208. The Academy will not enter into any finance leases without prior approval from the ESFA. Any such approval requests will be submitted to the Audit committee and Trust board before seeking ESFA approval.
209. The Academy will seek the ESFA's approval prior to arranging any borrowing including overdraft facilities from any source.
210. Credit Cards will only be used for business expenditure and balances will be cleared before any interest accrues.

Pooling of GAG

211. The Academy trust pools a proportion of GAG. For each Academic Year this value will be agreed by trustees and will be published in minutes of the board meeting and is exclusive of PFI funding.

212. The contribution will be agreed by Trustees each year for each academy within the MAT. This contribution will be calculated on an individual basis for each academy within the Trust.
213. If a constituent academy's principal feels that the academy has been unfairly treated, they should appeal to the trust in writing, stating the date and reason for their appeal. If the academy principal's grievance is not resolved, they can then appeal to the Secretary of State, via ESFA, whose decision will be final and who can dis-apply the provisions for pooling in the Academies Financial Handbook in relation to the MAT. While there are only three academies within the MAT the Academy principal must seek written approval for appeal from their Executive Principal before an appeal is raised.
214. The pooled GAG fund is to contribute towards Multi Academy Trust Costs.
215. A report on the income and expenditure of the pooled funds is produced by the Executive Business Manager each month. This report is reviewed by the Audit committee and will be shared with trustees, governors and Academy Principals following audit committee review.

VAT

VAT 126 form

216. The Executive Business Manager is responsible for submitting the VAT 126 form regularly at Trust level for all academies within the trust. VAT registration rules are checked regularly and external advice is sought from the accountants.

Fixed assets

Asset register

217. All items purchased with a value over the academy's capitalisation limit of £1,000 must be entered on the fixed asset register with the following details:
- asset description
 - asset number
 - serial number
 - date of acquisition
 - asset cost
 - source of funding (% of original cost funded from grant and % funded from other sources)
 - expected useful economic life
 - depreciation
 - current book value
 - location
 - name of member of staff responsible for the asset
218. The asset register helps:
- ensure that staff take responsibility for the safe custody of assets
 - enable independent checks on the safe custody of assets, as a deterrent against theft or misuse
 - to manage the effective utilisation of assets and to plan for their replacement
 - help the external auditors to draw conclusions on the annual accounts

- support insurance claims in the event of fire, theft, vandalism or other disasters

219. Examples of items to include on the asset register include:

- ICT hardware and software (this list can be combined and used to identify software licences to ensure the school is complying with legislation)
- Reprographic equipment – photocopiers, comb binders, laminators
- Office equipment – fax machines, shredders, switchboard
- Furniture
- AV equipment – TVs, video/DVD players, OHPs, cameras, speakers
- Cleaning equipment – vacuum cleaners, polishers
- Catering equipment – ovens, fridges, dishwashers, food processors
- Technology equipment – sewing machines, craft machinery
- Premises equipment – lawn mowers, power tools, generators
- Other equipment – musical instruments, PE equipment □ Mini buses

Security of assets

220. All the items in the register are permanently and visibly marked as the academy trust's property.

221. Equipment is, where possible, stored securely when not in use.

222. An annual count is undertaken by Senior Administration and Finance Officer, who is different from the preparer of the asset register (Evolve ICT Technician). Where discrepancies between the physical count and the amount recorded in the register are found these are investigated promptly and, where significant, reported to the trust board.

Disposals

223. Disposals, where applicable, are in line with the Academies Financial Handbook.

224. Items which are to be disposed of by sale or destruction must be authorised for disposal by Chair of Trustees and, where significant, should be sold following competitive tender. The academy must seek the approval of the ESFA in writing if it proposes to dispose of an asset for which capital grant in excess of £20,000 was paid.

Depreciation

225. The trust will depreciate assets in line with recognised accounting standards, best practice and DfE guidelines. All depreciation will be on a straight line basis and will be reported within the balance sheet summary to trustees on an annual basis.

226. Land and Buildings are depreciated at the level dictated by the DfE.

227. Fixtures and fittings and motor vehicles are depreciated over 5 years.

228. ICT equipment is depreciated over 4 years.

Loan of Assets

229. Items of academy property must not be removed from academy premises without the authority of the Academy Principal. A record of the loan of equipment must be recorded in the academy office and booked back into the academy when it is returned.
230. 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 should therefore be kept under review and any potential benefits discussed with the academy's auditors.

Monitoring outcomes and reviews

231. Outcomes will be monitored and reviewed by regular internal checks and scrutiny by senior management including an annual review with the Executive Business Manager and Chair of Audit committee.
232. Effectiveness of this policy and any associated procedures will also be monitored by the Audit Committee, supported by External Audit, including the Regularity Audit, and regular testing by the Executive Business Manager. Audit results will be presented by regular written reports to the Audit Committee. Findings & recommendations will be used to revise this policy and associated procedures- this will be undertaken by referring any recommendations for changes to the Audit committee.
233. Key indicators of the success of this policy are:
- No inappropriate use of money
 - Adherence to budgets
 - Value for Money being demonstrated
 - Expenditure targeted on key priority areas
 - Timely reports to Board, DfE and others
 - Up to date, accurate records

Appendix 1.

Statement of Regularity, Propriety and Compliance

As accounting officer of ESPRIT Multi Academy Trust I have considered my responsibility to notify the trust board of trustees and the Education and Skills Funding Agency (ESFA) of material irregularity, impropriety and non-compliance with ESFA terms and conditions of funding, under the funding agreement in place between the academy trust and the Secretary of State for Education. As part of my consideration I have had due regard to the requirements of the Academies Financial Handbook 2019.

I confirm that I and the academy trust board of trustees are able to identify any material irregular or improper use of all funds by the academy trust, or material non-compliance with the terms and conditions of funding under the academy trust's funding agreement and the Academies Financial Handbook 2019.

Delete as appropriate

I confirm that no instances of material irregularity, impropriety or funding non-compliance have been discovered to date. If any instances are identified after the date of this statement, these will be notified to the board of trustees and ESFA. or

I confirm the following instances of material irregularity, impropriety or funding non-compliance discovered to date have been notified to the board of trustees and ESFA. If any instances are identified after the date of this statement, these will be notified to the board of trustees and ESFA:

Financial Issues	Non-Financial Issues

Signed

Stephanie Moran

Executive Principal / Accounting Officer

Dated _____

Appendix 2.

Gift and Hospitality Register

Date Register taken to Trust board

Signed by Accounting Officer

Signed by Chair of Trustees

All gifts over £25 are recorded on this sheet, this is with the exception of gifts purchased as a group by employees within the academy trust for others within the academy trust, E.g. Joint wedding, birthday or birth of child collections. The gift and hospitality register will be shared with trustees annually.

Recipient	Donor	Date	Item	Value if known

Appendix 3.

Staff Roles & Segregation of duties

Purchasing Goods and Services - orders

Document / Process	By Whom
Paper order requisition raised by staff member (or)	Any staff member
Order requisition signed by	Budget holder - Follow current Financial delegation authority limits
Order requisition sent for input	Administration Team at academy
Order raised on PS Financials	Administration Team member
Goods received and checked by	Administration Team member
Invoice processed by	Senior Administration and Finance Officer
Supplier paid by BACS	Executive Business Manager

Purchasing via pre-signed contract / Service level agreement

Document / Process	By Whom
Contract / Service Level Agreement signed	Executive Business Manager, Academy Principal or Executive Principal in line with Financial delegation authority
Order raised on PS Financials	Administration Team member
Invoice processed by	Senior Administration and Finance Officer
Supplier paid by BACS	Executive Business Manager

Purchasing via Debit Card

Document / Process	By Whom
Debit Card payment request	All staff
Signature on Debit card payment request	Senior Administration and Finance Officer or Academy Principal – in line with Financial delegation authority
Debit card transaction completed	Card holder
Debit card transaction input onto PS Financials	Senior Administration and Finance Officer
Bank Statement Reconciliation	Senior Administration and Finance Officer
Bank Reconciliation check	Executive Business Manager

Sales Invoices

Document / Process	By Whom
Invoice raised by	Administration Team member
Invoices sent to customer	Administration Team member
Income received into academy	Senior Administration and Finance Officer

Income checked to invoice	Administration Team member
Income banked on PSF (match to invoice)	Administration Team member
Income banking countersignature (Paying in slips)	Administration Team member
Bank reconciliation on PSF	Executive Business Manager

Cash Income

Document / Process	By Whom
Cash receipted into Academy office	Administration Team member
Cash receipted and banked (Paying in slips)	Administration Team member
Cash receipted into PSF	Senior Administration and Finance Officer
Bank statement reconciliation to income	Executive Business Manager

Paypal Income

Document / Process	By Whom
Register created	Administration Team member
Income download from parentpay	Administration Team member
Income input into finance system	Senior Administration and Finance Officer
Bank statement reconciliation to income	Executive Business Manager

Paying suppliers

Document / Process	By Whom
BACS report raised in PS Financials	Executive Business Manager
Supplier amounts reviewed to Financial scheme of delegation	Executive Business Manager
Supplier payments reviewed – to check for duplications / errors	Executive Business Manager
Random review of supplier payments	Executive Principal or their deputy
BACS entered onto Lloyds bank and authorised	Executive Business Manager
Counter authorised by	Executive Principal or Deputy Executive Principal
Remittances to suppliers	Executive Business Manager

Staff Expenses

Document / Process	By Whom
--------------------	---------

Expense Form completed	Any Staff member
Signed by	Academy Principal / Executive Principal
Entered onto PS Financials	Senior Administration and Finance Officer
BACS payment raised by	Executive Business Manager
BACS payment list checked to staff expense forms	Executive Principal or Deputy
BACS entered onto Lloyds bank and authorised by	Executive Business Manager
Counter authorised by	Executive Principal or Deputy
Remittances to employees	Executive Business Manager

Payroll Process

Document / Process	By Whom
Payroll updates / additional hours / change of contract forms / Dr's note	Senior Administration and Finance Officer
Contractual changes / additional costs / leavers forms / new starter forms	Signed by Academy / Executive Principal / Chair of Trustees
Payroll system updated, including pensions, tax, PAYE, NI, etc.	Payroll Provider
Month End Payroll report produced by	Payroll Provider
Month End payroll total value checked by	Executive Business Manager
Queries raised to payroll by secure email	Executive Business Manager
Final BACS payment report produced by	Payroll Provider
Final BACS payment report signed by	Executive Business Manager or Executive Principal or their deputy
Payroll journal onto PS Financials	Executive Business Manager
Bank Reconciliation	Executive Business Manager