

FINANCIAL REGULATIONS

Version	2.2
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Last reviewed	March 2025
Date of next review	December 2026
Approved by Trustees	11 th December 2025

Summary of amendments:
V2.1 ESFA updated to DfE/additional wording added to 7.12 re DfE approval/s.11 added special payments
v2.2 CFO title amended to CFOO to reflect change of duties. Section 11.3 amended to £174k. Additional point 11.6 added.

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1.0 POLICY STATEMENT

The purpose of these regulations is to ensure SHARE Multi Academy Trust (the trust) maintains and develops systems of financial control which conform to the requirements both of propriety and of good financial management and meets the requirements of our funding agreement with the Department for Education (DfE).

2.0 ORGANISATION

2.1 The trust has defined the responsibilities of all individuals involved in the administration of academy finances, to avoid the duplication or omission of functions and to provide a framework of accountability for trustees, governors and staff.

Members

2.2 Members have a similar role to the shareholders of a company limited by shares. They:

- are the subscribers to the memorandum of association (where founding members);
- may amend the articles of association subject to any restrictions created by the funding agreement or charity law;
- may, by special resolution, appoint new members or remove existing members; other than, a sponsor body (as relevant) and any members it has appointed;
- have powers to appoint trustees as set out in the trust's articles of association and powers under the Companies Act 2006 to remove trustees;
- may, by special resolution, issue direction to the trustees to take a specific action;
- appoint the trust's external auditors and receive (but do not sign) the audited annual report and accounts (subject to the Companies Act); and
- have power to change the company's name and, ultimately, wind it up.

The Board of Directors (the board)

2.3 The board is responsible for overseeing the financial performance of the trust and making sure funds are well spent. The main responsibilities of the board are prescribed in the Funding Agreement between the trust and the DfE and in the trust's Scheme of Delegation (SoD), i.e.:

- ensuring that grant income from the DfE is used only for the purposes intended;
- ensuring that funds from sponsors are received according to the trust's Funding Agreement, and are used only for the purposes intended;
- ensuring that the trust has a written SoD of financial powers (reviewed annually, and when there has been a change in trust management or organisational structure);
- approval of the annual trust budget; and
- appoint the CEO (and approve Chief Finance Officer and Director of Operations appointments).

The Audit and Risk Assurance Committee (A&RAC)

2.4 All trusts **must** have a dedicated audit and risk committee, comprising a majority of directors. The committee may be combined with the finance committee if the annual income is <£50m.

2.5 The A&RAC comprises Members and Trustees who are not involved in any decisions relating to the finances anywhere in the trust. They advise the board on:

- the strategic processes for risk, control and governance;
- financial policies, reviewing the draft Annual Report and Financial Statements and any findings by the external auditors;



The Audit and Risk Assurance Committee (A&RAC)

- the planned activity and results of internal and external audit, including the adequacy of management response to issues, and the external audit's management letter;
- assurances relating to the management of risk and corporate governance requirements for the organisation;
- proposals for tendering for either internal or external audit services or for purchase of non-audit services from contractors who provide audit services;
- anti-fraud policies, whistle-blowing processes, and arrangements for special investigations; and
- the A&RAC will produce an annual report, including a review its own effectiveness.

Chief Executive Officer (CEO) and Accounting Officer

2.6 The trust board **must** appoint a named individual as accounting officer. This should be the senior executive leader, i.e. the CEO, and **must** be employed by the trust.

2.7 The accounting officer role includes specific responsibilities for financial matters. It includes a personal responsibility to Parliament, and to the DfE's accounting officer. The CEO responsibilities include:

- **must** assure Parliament, and the public, of high standards of probity in the management of public funds, particularly regularity, propriety and value for money.;
- **must** adhere to the 7 principles of public life;
- **must** have oversight of financial transactions;
- **must** complete and sign a statement on regularity, propriety and compliance annually and submit this to the DfE with the audited accounts;
- **must** demonstrate how the trust has secured value for money via the governance statement in the audited accounts;
- **must** take personal responsibility for assuring the board that there is compliance with the funding agreement and handbook, and put in writing where the board fails to act where required; and
- **must** notify the DfE, immediately in writing, in the event the actions proposed by the trust board is in breach of the articles, the funding agreement or the handbook.

The Chief financial and operations officer (CFOO)

2.8 The trust board **must** appoint a chief financial and operations officer (CFOO) who is the trust's finance director, business manager or equivalent, to whom responsibility for the trust's detailed financial procedures is delegated. The CFOO should play both a technical and leadership role and **must** be employed by the trust. The CFOO responsibilities include:

- The CFOO and their finance staff **must** be appropriately qualified and/or experienced;
- The trust board **must** assess whether the CFOO, and others holding key financial posts should have a business or accountancy qualification, and membership of a relevant professional body, dependent on the risk, scale and complexity of financial operations; and

The DfE encourages larger trusts (>3,000 pupils) to consider the range of accountancy qualifications available from professional bodies such as the ICAEW, ACCA, CIMA or CIPFA, and take this into account when filling CFOO vacancies.



The governance professional (Clerk to the board)

- 2.9 The trust board **must** appoint a governance professional to support the board of trustees, who is someone other than a trustee, principal or chief executive of the trust. is delegated.

Executive Principal/Headteacher/Associate Principal

- 2.10 Provides strategic leadership for the academy, which includes:
- all the statutory responsibilities and powers ascribed to a headteacher under the most recent School teachers' pay and conditions document (STPCD);
 - leads the academy on a day-to-day basis and is accountable to the CEO for the financial performance of the academy; and
 - where an academy has an associate principal, the Executive Principal will provide guidance to the principal, who will remain accountable for financial performance to the CEO.

3.0 ACCOUNTING SYSTEM

- 3.1 All financial transactions of the trust must be recorded on 'The Access' accounting system.

System Access

- 3.2 Access to 'The Access' accounting system is password restricted and the Chief Finance Officer is responsible for ensuring that passwords are changed regularly.
- 3.3 Access to the component parts of the system is also restricted and finance managers are responsible for setting access levels at academy level for all members of staff using the system. The Chief Finance Officer is responsible for setting access levels for central staff.

All documents are signed or initialled digitally using PDF software where required, all members of the finance team are set up to use this system, all reports and invoices are stored digitally on the finance network, paper files are no longer kept.

Back-up Procedures – Accounting System Databases

- 3.4 Databases are cloud based - hosted by The Access Group (not on the academies servers).

Transaction Processing

- 3.5 All transactions processed in the accounting system must be authorised in accordance with the procedures specified in these regulations. All journal entries are reviewed by finance managers prior to being processed. All Bank transactions are checked and reconciled to the bank statements generated by the Lloyds Commercial Banking platform, monthly reconciliation reports are generated in Access and signed digitally to evidence this check, by Finance Managers.
- 3.6 Operation of 'The Access' accounting system must conform to the user instructions, details of which are published in the on-line manuals.



Transaction Reports

- 3.7 Finance Managers will obtain and review system reports to ensure that only expected transactions are posted to the accounting system. Reports obtained and reviewed will include:
- audit trail reports;
 - journal reports for payroll, purchase ledger, sales ledger and cashbook; and
 - management accounts summarising expenditure and income against budget at budget holder level.

Reconciliations

- 3.8 Finance Managers are responsible for performing the following reconciliations each month, and clearing any reconciling or balancing amounts:
- sales and purchase ledger control accounts;
 - payroll, fixed asset and suspense control accounts; and
 - bank statement to accounting system.
- 3.9 Any unusual or long outstanding reconciling items must be brought to the attention of the Chief Finance Officer, who will review and document reconciliations as evidence.
- 3.10 The Chief Finance Officer will review month-end reports across all ledger areas.

4.0 BUDGETS AND FINANCIAL PLANNING

- 4.1 The trust prepares both short-term (1 year) and medium term (3-year) financial plans. The budget is a detailed statement of the expected resources available to the trust and the planned use of those resources for the forthcoming year.
- 4.2 The board ensures budget forecasts for the current year and beyond are compiled accurately, based on realistic assumptions (including any provision being made to sustain capital assets), challenge pupil number estimates (reviewed termly), and reflect lessons learned from prior years.
- 4.3 The board approves a balanced budget annually, drawing on unspent funds brought forward from previous years. The board minutes its approval, and submits it to the DfE, in the form specified by the DfE.
- 4.4 In the event the trust is proposing to set a deficit revenue budget for the current financial year (after taking into account any unspent funds from previous years), it must notify the DfE within 14 calendar days.

Annual Budget

- 4.5 The trust budget must be submitted to the board for ratification by 31 July each year. Indicative budgets (i.e. draft budgets prepared by Finance Managers must be in place by 31 May each year. Budgets require authorisation by the CEO and Chief Finance Officer prior to being presented to the board.
- 4.6 The annual budget will reflect the best estimate of the resources available to the trust for the forthcoming year and will detail how those resources are to be utilised – with a clear link between development plan objectives and the budgeted utilisation of resources.



- 4.7 The budgetary planning process will be planned in accordance with the trust SoD, and incorporate the following elements:
- forecasts of the pupil numbers to estimate the amount of DfE grant receivable;
 - review of other income sources available to the trust;
 - review of past performance to promote an understanding of the trust cost base;
 - review of expenditure headings to ensure development plan objectives, pay increases, inflation and other anticipated changes are incorporated; and
 - identification of potential efficiency savings.

Annual Budget

- 4.8 The budget should 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 should be seen as a working document which should be revised throughout the year as circumstances change.

3-Year Forecasts

- 4.9 A comparison of estimated income and expenditure over the medium term is undertaken to identify any potential surplus or shortfall in funding and enable actions to be put in place in a measured and timely manner.
- 4.10 If a potential surplus is identified, it may be held as a general contingency until plans for its allocation are established, or alternatively, funds can be diverted elsewhere.
- 4.11 In the event a shortfall is identified, opportunities to increase income or make savings are explored. This may entail deferring projects until funding is more stable. Budget plans will be reviewed on a regular basis until a balanced budget is restored.

Trust and School Improvement Plans

- 4.12 The Trust Improvement Plan (TIP) is concerned with the future aims and objectives of the trust and how they are to be achieved (including resources required). The "big picture" within which more detailed plans may be integrated. The form and content of the TIP give due regard to the matters included within the guidance issued by the DfE.
- 4.13 Each year the principal/headteacher of each academy, advised by the Executive Principal and in conjunction with their Governing Body will submit their Academy Improvement Plan (AIP), Self-Evaluation Form (SEF) and Curriculum Led Financial Plan (CLFP) to the CEO in the spring term.
- 4.14 The completed AIP includes detailed objectives for the coming academic year. The plan also includes the estimated resource costs, both capital and revenue, associated with each objective and success criteria against which achievement can be measured.
- 4.15 Academy leaders monitor performance against defined success criteria and report to the CEO with any recommendations for action(s) as relevant. Governors will scrutinise progress against the plan.
- 4.16 The CEO submits the TIP to the board by 30 June annually.



Monitoring and Review

- 4.17 Detailed bi-monthly management accounts are prepared by Finance Managers and reviewed by the Chief Finance Officer. Reports detail actual income and expenditure, variances against budget and financial performance indicators. These are issued to principals/headteachers, governing bodies and the board. The board also receives a cashflow report and balance sheet.
- 4.18 Any potential overspend against the budget must in the first instance be discussed with Finance Managers. Parameters in the accounting system prevent orders being processed against an overspent budget without the approval of the Finance Managers.
- 4.19 A spend from reserves application must be completed before variation from the approved budget. The application must be approved by the Chief Finance Officer, CEO and potentially the board in line with the SoD.
- 4.20 The monitoring process should be effective and timely in highlighting variances in the budget so that they can be investigated and action taken where appropriate. If an overspend is forecast, it may be appropriate to transfer funds from another budget or the general contingency – authorised in accordance with the trust SoD.

5.0 PAYROLL/PENSIONS

- 5.1 The main elements of the payroll system are; staff appointments, payroll and pensions administration. Payroll is completed in-house and is administered by the Payroll Manager and Payroll/HR Officer. The system used is IRIS (Payrite).

Staff Appointments

- 5.2 The principal/headteacher can approve most staffing changes relating to their academy, in accordance with the trust's SoD with the express approval in the first instance of the CEO / Chief Finance Officer.
- 5.3 Administration Managers are responsible for the administration of employment contracts, terms and conditions of services. All staffing changes must be notified and authorised by the appropriate signatory as detailed in the trust SoD on the appropriate payroll form to payroll as soon possible.

Payroll Administration

- 5.4 All staff are paid on a monthly basis. A master electronic file is held for each employee recording salary; bank account details; taxation status; personal details, deductions or allowances payable, and pension details.
- 5.5 Absence management forms are completed by the academy administrative manager responsible for the process and provides details of sickness and other absences during the period and entered onto the HR/Payroll system.
- 5.6 New appointments, terminations and pay related changes and claims are administered centrally by the payroll department and checked by the Payroll Manager.



Payroll Financial Transactions

- 5.7 After the payroll has been processed summary/variance reports are issued to the central finance team by the Payroll Manager. The reports are reviewed against payroll variation forms and authorised by the central finance team. Any changes not on a payroll variation form are highlighted at this point for Payroll to investigate.
- 5.8 Payroll transactions are administered through the trust central fund bank account and then recharged to academies – with funds transferred from the academies back into the trust central fund bank account.
- 5.9 All salary payments are made by BACS from the trust central fund bank account.
- 5.10 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.
- 5.11 Voluntary deductions include childcare vouchers, salary sacrifice schemes (e.g. computer and cycle schemes), and union subscriptions.
- 5.12 The Chief Finance Officer reconciles the payroll recharges through the operation of a payroll control account within the IMP Planner budgeting system.

Payroll Financial Transactions

- 5.13 Finance Managers monitor salary payments on an individual employee basis by performing a full reconciliation using the IMP Planner budgeting system every month. This is completed by uploading data directly from our payroll software into the budgeting software. A comparison of data in the Access finance system is also performed monthly to monitor actual expenditure against budget.
- 5.14 Finance Managers reconcile payroll charges from the payroll master reports to nominal ledgers within the accounting system - on an individual academy basis.
- 5.15 On an annual basis the Finance Managers (in consultation with the HR manager) checks each member of staff to ensure that the gross pay per the HR Every system agrees to the budget and contract of employment held on the personnel files. Any discrepancies are queried with the payroll team.
- 5.16 On an annual basis the Chief Finance Officer reconciles the payroll costs charged to each academy with the total 'trust' payroll cost.

6.0 PROCUREMENT

- 6.1 The trust **must** be able to show that public funds have been used as intended by Parliament. The trust **must** ensure:
- spending has been for the purpose intended and there is probity (no corruption or private gain involved in the contractual relationships) in the use of public funds;
 - spending decisions represent value for money;
 - internal delegation levels exist and are applied;
 - a competitive tendering policy is in place and applied, and the procurement rules and thresholds in the Public Contracts Regulations 2015 and Find a Tender service are observed; and
 - professional advice is obtained where appropriate.



Ordering Goods and Services

- 6.2 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 available funds are not overspent. Budget holders are encouraged to regularly review the reports in the Access system and are encouraged to keep their own commitment records.
- 6.3 All order requisitions must be made electronically (or in exceptional circumstances via an official order requisition form obtained from the academy administrative manager, who will complete the electronic requisition on behalf of the budget holder). Requisitions will be checked by the Procurement Officer to ensure adequate budgetary provision exists before the official order is generated to the supplier.
- 6.4 Orders are processed in 'The Access' accounting system and distributed to suppliers electronically by the central finance team.
- 6.5 The budget holder must make appropriate arrangements for the delivery of goods to the academy. On receipt, the budget holder must check the goods received against the goods received note (GRN), recording any discrepancies and discussing them with the supplier. These checks should be performed without undue delay to ensure payments can be processed in accordance with the credit terms of the supplier. The signed GRN should be retained by the academy as evidence of the delivery.
- 6.6 If any goods are rejected or returned to the supplier because they are not as ordered or are of sub-standard quality, the central finance team should be notified.

Ordering Goods and Services

- 6.7 The majority of suppliers submit invoices electronically to the central finance team email address. Academy administrative managers are required to forward any invoices received by academies to the central finance office. Invoices are processed in 'The Access' accounting system, by the central finance team.
- 6.8 The central finance team check those goods invoiced match the order (description, unit price, quantity, discounts agreed on order, and VAT charged). A grid is added digitally with the date received and the invoices moved to the relevant folder on the system for processing. The grid is populated with the following data:
- invoice number, cost centre and ledger code charged;
 - digital initials of the person processing the invoice, digital signature of the payment approvers and date paid.
- 6.9 Web requisitioning embeds the audit trail in the accounting system. By exception, the signature of the budget holder confirming delivery has been made and confirming payment can be released will need to be evidenced in writing. Such evidence is uploaded to the Access system attached to the relevant invoice.
- 6.10 If a budget holder is pursuing a query with a supplier the academy administrative manager and the central finance team must be notified of the query and kept up to date with progress towards a resolution. The invoice will not be paid until the query has been resolved.
- 6.11 At the end of the month a review is made of invoices which have exceeded their payment terms and action taken appropriately.
- 6.12 The central finance team will input details of payments to be made to the purchase ledger and generate the BACS payment run.



- 6.13 The BACS run report together with the purchase ledger invoices being paid, must be checked and authorised by two of the nominated bank signatories, bank details, invoice number, address and amount are checked on every payment made payments are automatically dispatched to suppliers once payments have been authorised.

Buying through a Government Framework

- 6.14 Purchases can be made using a government framework without having to run a full buying process. Each framework has details of goods and services available, an agreed pricing structure, terms and conditions, and guidance on how to buy.
- 6.15 The School Commercial Team within the DfE set up and review a range of frameworks, and the DfE provide 'buying for schools' guidance to help schools secure the best deal.
- 6.16 Buying from a framework can be quicker and easier than getting bids or quotes because the agreements have already been set up through a full competitive tender process, have been quality checked, checked that they comply with the law, and may have draft specifications and help available.

Ordering Goods and Services – up to £9,999

- 6.17 Purchases up to £9,999 can be requisitioned by budget holders (secondary academies), and headteacher and budget holders (primary academies). One quotation must always be secured (before an order is placed) for purchases up to £4,999, and 3 (written) quotations are required for purchases over £5,000. A supplier should be chosen from the list of approved suppliers maintained by the Procurement Officer. If the budget holder considers better value can be obtained by ordering from a supplier not on the approved supplier list, this must be agreed by the Procurement Officer IT and Premises project/maintenance work require at least 1 quotation, 3 where possible, for orders up to £14,999, orders between £15,000 and £49,999 require 3 written quotations. All IT purchases are ordered by the IT team.

Ordering Goods or Services - between £10,000 and £49,999

- 6.18 Purchases between £10,000 and £49,999 must be approved by academy headteachers (or for purchases from the central budget, Directors of Operations, Finance, School Improvement, TSH). At least three written quotations are required. Written quotations should be passed to the Procurement Officer for audit purposes.
- 6.19 In exceptional circumstances (such as an emergency that might pose a risk to the academy, or a limited field of available suppliers), it may not be viable to secure three written quotations in advance of the order. In such situations, advice should be sought from Finance Managers or the Procurement Officer.
- 6.20 Multiple small orders should not be placed with one supplier in order to avoid obtaining three written quotations. Annual spend by supplier (including the number of orders raised) is reviewed by Finance Managers to ensure three written quotations are obtained where the annual spend is greater than £5,000.

Ordering Goods or Services - between £50,000 and £99,999

- 6.21 Purchases between £50,000 and £99,999 or for a series of contracts which in total exceed £50,000 must be subject to formal tendering procedures. These must be approved by the CEO and the budget holder (or for purchases from the central budget, the CEO and Directors of Operations, Finance, School Improvement, TSH).



Ordering Goods or Services – £100,000 and above

- 6.22 All goods/services ordered with a value of £100,000 and above (total to be calculated on the duration of the contract), must be approved by 2 members of the board of directors, and the CEO, Directors of Operations and Finance.
- 6.23 Contracts over the WTO GPA threshold (£213,477 January 2024), require tenders to be posted on the government's new procurement portal 'Find a Tender', unless procured through a government framework.

Purchase of Alcohol

- 6.24 The trust's funds must not be used to purchase alcohol for consumption, except where it is to be used in religious services.

Forms of Tenders

- 6.25 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:** All potential suppliers are invited to tender through the 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:** Selected suppliers are invited. This is appropriate where there is a need to maintain a balance between the contract value and administrative costs, a large number of suppliers exist, only specific suppliers can supply (due to the nature of the goods), and the costs of advertising outweigh the benefits of open tendering.
 - **Negotiated Tender:** The terms may be negotiated with one or more chosen suppliers where the above methods have resulted in either no or unacceptable tenders, one/very few suppliers are available, and extreme urgency exists.

Preparation for Tender

- 6.26 Full consideration should be given to the objective of project overall requirements, technical skills required, after sales service requirements, and form of contract.
- 6.27 After all requirements have been established and ranked, marks are awarded on fulfilment of these requirements - to help reach a decision.

Invitation to Tender (ITT)

- 6.28 If a restricted tender is to be used then an ITT must be issued. If an open tender is used an ITT may be issued in response to an enquiry.
- 6.29 An ITT should include the introduction/background to the project, scope and objectives (including technical requirements), implementation of the project, and terms and conditions of the tender and form of response.

Aspects to Consider

- 6.30 **Financial.** Like should be compared with like and if a lower price means a reduced service or lower quality this must be borne in mind when reaching a decision. Care should be taken to ensure that the tender price is the total price and that there are no extra costs - and whether there is any scope for negotiation.
- 6.31 **Technical/Suitability.** Undertake checks including the contractor's qualifications, relevant experience, technical and service facilities, certificates of conformity with standards/quality control, and references from other customers.



- 6.32 **Other.** Determine, pre-sales demonstrations, after sales service, and the financial status. Suppliers in financial difficulty may have problems completing contracts or providing after sales services. It may be appropriate to examine audited accounts.

Tender Procedures

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

Tender Procedures

- 6.36 Those required to be present should be in accordance with the trust's SoD.
- 6.37 All tenders submitted should be opened at the same time and tender details should be recorded. A separate record should be established to record the names of the firm's submitting tenders and the amount tendered and signed by the parties present.
- 6.38 The evaluation process should be in accordance with the trust's SoD. 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.
- 6.39 Those involved in deciding must take care not to accept gifts or hospitality from potential suppliers that could compromise or be seen to compromise their independence.
- 6.40 Full records should be kept of all criteria used for evaluation and for contracts over £50,000 a report should be prepared in accordance with the trust's SoD highlighting the relevant issues and recommending a decision.
- 6.41 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.
- 6.42 The accepted tender should be the one that is economically most advantageous to the trust. All parties should then be informed of the decision.

Appointment of External Auditors

- 6.43 Trusts should retender their external audit contract at least every 5 years and must consider the evaluation points as outlined in the Academy Trust Handbook.

7.0 INCOME

- 7.1 The main sources of income for the trust are the grants from the DfE, local authority and other government departments. Finance Managers are responsible for ensuring that all grants due to the trust are collected.
- 7.2 Each academy generates income from students (for trips, visits and activities) and from the public (sports and community lettings). The trust operates a cashless system with the exception of fundraising events (e.g. summer fetes, charitable and book events).
- 7.3 Debtor invoices are raised within two weeks following the provision. A monthly aged debtor report is produced and outstanding debts reviewed. Customers are chased for outstanding debts at the month end following the debt due date.



Trips, Visits and Activities

- 7.4 A lead person (usually a teacher) must be appointed for each trip to take responsibility for the collection of sums due (via ParentPay/Arbor). The lead person must follow procedures outlined in the academy policy and guidelines. The academy administrative manager acts as educational visits coordinator.
- 7.5 Students should make payments electronically using the (ParentPay/Arbor) on-line facility. A receipt must be issued for all monies collected and the value of the receipt and the number of the receipt recorded against the student making the payment.
- 7.6 The central finance team ensures ParentPay/Arbor payment system maintains records for each student showing the amount received. The administrative manager will have access to the system and is responsible for chasing any amounts outstanding.

Sports and Community Lettings

- 7.7 The administrative manager is responsible for maintaining records of bookings of sports and community facilities and for identifying the sums due from each organisation.
- 7.8 Payments must be made immediately after the use of facilities.
- 7.9 Details of organisations using the sports facilities should be sent by the central finance team who will establish a sales ledger account and produce a sales invoice.
- 7.10 Details of payments made and outstanding accounts will be reviewed by Finance Managers on a regular basis who is responsible for chasing outstanding debts and ensuring no further use is made of the facilities without payment.
- 7.11 Sales invoices include details of how to make payments.
- 7.12 Debts can only be written off in accordance with the trust's SoD. DfE approval must be sort before any debts are written off in excess of limits outlined in The Academy Trust Handbook.

Custody of Income

- 7.13 Cashless (online) payments are required. Only in the most exceptional of circumstances (i.e. the debt will not be paid) will cash or cheques be accepted. Cash or cheques received must be stored in the academy safe, prior to banking.
- 7.14 Official, numbered academy receipts should be issued for all cash and cheques received where no other formal documentation exists.
- 7.15 The central finance team is responsible for counting and checking cash and cheques and preparing documents ready for transportation by the cash collection provider to the bank. This is performed on the academy site by 2 members of the central finance team.

8.0 CASH MANAGEMENT

Bank Accounts

- 8.1 The opening of all accounts must be authorised by the Chief Finance Officer setting out arrangements covering the operation of accounts, including any transfers between accounts and the operation of systems such as BACS and other means of electronic transfer of funds.



Deposits

- 8.2 Particulars of any deposit must be entered on a copy paying-in slip or counterfoil. Details should include the amount of the deposit and reference (the number of the receipt or the name of the debtor).

Payments and withdrawals

- 8.3 All financial instruments authorising withdrawal from academy bank accounts must bear the signatures of two of the following authorised signatories: CEO, principal/headteacher, and other approved signatory as outlined in the mandate to the bank account. This provision applies to all accounts, public or private, operated by or on behalf of the trust. Authorised signatories must not sign a financial instrument relating to goods or services for which they have also authorised the expenditure.

Administration

- 8.4 Finance Managers must ensure bank statements are reconciled at least monthly.

Administration

- 8.5 Reconciliation procedures must ensure that:
- all bank accounts are reconciled to the trust's cash book; and
 - reconciliations are subject to an independent monthly review carried out by the Finance Managers, who will ensure adjustments are dealt with promptly.

Petty Cash Accounts

- 8.6 The trust maintains petty cash at each academy, administered by the administrative manager and kept in the safe. Petty cash is available for the welfare and safeguarding of students, and for small purchases required immediately (e.g. fuel for a lawnmower).

Business Charge Cards

- 8.7 The central finance team holds business charge cards issued by Lloyds Bank Plc, in order to process purchase transaction across all academies in the trust, namely
- Lisa Audsley, Premises Manager
 - Leanne Greene, Procurement Officer
 - Alfie Jackson, Procurement/finance assistant
 - Katy Townend, Finance Manager
 - Megan Hendy, Finance Manager
 - Kris Shepley, Finance Manager
- 8.8 In addition, each academy administrative manager (and the Resourced Provision at Thornhill) holds a business charge card issued for small purchases. The card use is restricted for payments relating to the welfare and safeguarding of students, supermarket purchases, and for fundraising events.
- 8.9 Transactions are subject to the same procedure as outlined in the Purchases Section (602-613), substituting credit card payment, where reference is made to BACS payments.

Deposits

- 8.10 Deposits to petty cash are via withdrawals made from business cashpoint cards held by the central finance team. Receipts are recorded in the petty cash system with the date, amount and a reference. All other cash receipts should be paid directly into the bank.



Payments and Withdrawals

8.11 In the interests of security, petty cash payments will be limited to £50 (reviewed annually). Higher value payments follow the purchasing procedure (Section 6).

Administration

8.12 The academy administrative manager is responsible for maintaining petty cash transactions. Regular as well as unannounced cash counts are conducted by central finance to ensure that the cash balance reconciles to supporting documentation. This is added to the Access system and balanced to the reconciliation done.

Physical Security

8.13 Petty cash should be held in a locking cash box which is put in the safe overnight.

Cash Flow Forecasts

8.14 Finance Managers are responsible for preparing cash flow forecasts to ensure sufficient funds are available for day-to-day operations. If significant balances can be foreseen, steps should be taken to invest funds. Similarly plans should be made to transfer funds from another bank account to cover potential cash shortages.

Investments

8.15 Investments must be in accordance with written procedures approved by the board and 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.

9. FIXED ASSETS

9.1 Academy trusts **must** obtain prior approval from the DfE for the following transactions:

- Acquiring or disposing freehold land or buildings
- Disposing of heritage assets beyond any limits in its funding agreement

Asset Register

9.1 All items purchased with a value over the trust's capitalisation de-minimus (£1,000 or lower for computer equipment) are included in the trust asset register.

9.2 The fixed asset register is maintained on the "EVERY" software system. Each asset register should include the following information:

- asset number and description;
- model, type and serial number;
- location and date of acquisition;
- asset cost, source of funding and current book value; and
- expected useful economic life, depreciation;



9.3 The Asset Register helps:

- ensure staff take responsibility for the safe custody of assets;
- enable independent checks as a deterrent against theft or misuse;
- to manage the effective utilisation of assets and to plan for their replacement;
- external auditors to confirm values in the annual accounts; and
- support insurance claims.

Security of assets

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

9.5 Where physically viable, all items on the register should be permanently and visibly marked as the trust's property. The trust uses tamper-proof bar code stickers.

9.6 Records of asset movements must be maintained.

9.7 Inventories of academy property should be kept up to date and reviewed regularly.

9.8 There should be a regular count by someone other than the person(s) maintaining the register. Discrepancies between the physical count and the amount recorded in the register should be investigated promptly and reported to the A&RAC.

9.9 Evidence that asset checks have been performed verified by the external auditors.

Disposals

9.10 Disposals are in accordance with the trust SoD.

9.11 Assets up to £20,000 (original cost) to be disposed of by sale or destruction must be authorised for disposal by the principal/headteacher and Chief Finance Officer, IT equipment disposal can be authorised by the Head of IT. Where a disposal is significant, it should be sold following competitive tender.

9.12 Assets over £20,000 (original cost) must be authorised for disposal by the CEO, trust Board and Chief Finance Officer.

9.13 Disposal of equipment to staff is not encouraged, as it may be more difficult to evidence the trust obtained value for money in any sale or scrapping of equipment. In addition, there are complications with the disposal of computer equipment as the trust would need to ensure licences for software programs have been legally transferred to a new owner. Approval by the Chief Finance Officer is required in all circumstances.

9.14 All disposals of land and/or heritage assets must be agreed in advance with the DfE.

Loan of Assets

9.16 Items of academy property must not be removed from academy premises without the authority of the principal/headteacher.

9.17 A record of loans (which may be made to either students or staff) must be recorded by the budget holder responsible for the purchase of the asset, including when it is returned. A copy of the list should be held by academy administrative managers.

9.18 The list of asset loans should be reviewed regularly and outstanding items chased.

9.19 Assets on loan for extended periods or to a member of staff on a regular basis 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 trust's auditors.

10.0 RELATED PARTY TRANSACTIONS

- 10.1 The Academy Trust Handbook states academy trusts **must** be even-handed in their relationships with related parties by ensuring that:
- trustees avoid conflicts of interest, do not accept benefits from 3rd 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/organisation uses their connection to the trust for personal gain;
 - 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. Where payments are permitted they **must** be provided 'at cost';
 - all contracts and other agreements with related parties must be reported to the DfE in advance;
 - DfE prior approval **must** be obtained where the total value of contracts and other agreements for the supply of goods or services to the trust by a related party agreed on or after 1 September 2023 where a contract or other agreement exceeds £40,000 in the same financial year ending 31 August. The approval requirements do not apply to contracts or other agreements with colleges, universities and schools which are sponsors of the academy trust or to state funded schools and colleges, including academies. 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

Register of Interests

- 10.2 The register should include all business interests such as directorships, trusteeships, governorships, shareholdings or other appointments of influence within a business, other educational institutions or other organisations.
- 10.3 It should also include business interests of close family relationships such as a parent or spouse or business partner where influence could be exerted by that person. A definition of close family relationships is available in the Academy Trust Handbook.
- 10.4 The existence of a register of business interests does not, of course, detract from the duties of governors and staff to declare interests whenever they are relevant to matters being discussed at meetings. Where an interest has been declared, governors and staff should not attend that part of the meeting.
- 10.5 The register of interests **must** be kept up to date at all times.
- 10.6 The trust **must** publish relevant business and pecuniary interests of members, trustees, local governors and accounting officers on its website.

11.0 SPECIAL PAYMENTS

11.1 The Academy Trust Handbook states that all trusts have autonomy over financial transactions arising in the normal course of business. However, some transactions have delegated authority limits beyond which trusts **must** obtain prior DfE approval regardless of the source of funds.

We will seek DfE approval for the following transactions:

- Novel, contentious and repercussive transactions
- Staff severance and compensation above the limits described below
- Ex gratia payments
- Writing off of debts in excess of DfE limits
- Entering into indemnities in excess of DfE limits
- Acquiring freehold land/buildings
- Disposing of freehold land/buildings
- Disposing of heritage assets
- Taking up finance leases not on the approved list
- Taking up a lease in excess of 7 years
- Granting a lease on land/buildings
- Taking up a loan or overdraft facility
- Related party transactions in excess of DfE limits.

Novel, contentious and repercussive transactions

11.2 Novel, contentious and repercussive transactions will be referred to the DfE for approval, before any transaction occurs.

Staff severance and compensation

11.3 Special staff severance payments are paid to employees outside statutory or contractual requirements when leaving employment. Before considering a staff severance payment above statutory or contractual entitlements a severance approval form must be completed and approved in line with the trust's Scheme of Delegation (SoD) before making a binding commitment.

Smaller sums, up to the limits given in the SoD, will be signed off by the Accounting Officer, following proposals agreed by the trust's Executive Business Team. Larger severance payments must be approved by the board, unless the value exceeds the level at which DfE approval is required.

Where the academy trust is considering a staff severance payment, including a non-statutory/non-contractual element of £50,000 or more, (gross, before income tax or other deductions); or an exit package which includes a special severance payment at or above £100,000; or the employee earns over £174,000, DfE's prior approval **must** be obtained before making any offer to staff.

Settlements must not be accepted unless satisfying the conditions detailed in The Academy Trust Handbook sections 5.8 to 5.16.

Ex gratia payments

11.4 Ex gratia transactions **must** always be referred to DfE for prior approval. We will seek advice from the DfE directly if in doubt.



Other Special Payments

- 11.5 Reference must be made to The Academy Trust Handbook, section 5 before any special payment is considered, to ensure we comply with DfE regulations. Where required, we will always seek DfE guidance or permission before entering any agreement.
- 11.6 The Academy Trust Handbook strictly prohibits the payment of any ransom or extortion demands in response to ransomware attacks or similar incidents. Paying ransom does not guarantee data recovery, may encourage further criminal activity, and could expose the organisation to legal and regulatory risks.

12.0 INTERNAL SCRUTINY

- 12.1 The Academy Trust Handbook states that all trusts **must** have a programme of internal scrutiny to provide independent assurance to the board that its financial and non-financial controls and risk management procedures are operating effectively.
- 12.2 Internal scrutiny **must** focus on:
- evaluating the suitability of, and level of compliance with, financial and nonfinancial controls
 - offering advice and insight to the board on how to address weaknesses in financial and non-financial controls
 - ensuring all categories of risk are being adequately identified, reported and managed.
- 12.3 The trust **must** identify on a risk-basis (with reference to its risk register) the areas it will review each year. This may involve greater scrutiny where procedures or systems have changed.
- 12.4 Independence **must** be achieved by those carrying out the checks reporting directly to a committee of the board, which in turn provides assurance to the board.
- 12.5 The trust **must** establish an audit and risk committee, appointed by the board, which meets at least 3 times a year. Trusts with an annual turnover of <£50m **must** either have a dedicated audit and risk committee or combine with another committee, such as finance.
- 12.6 Employees of the trust should not be members of the committee. The accounting officer and CFOO should attend to provide information / participate in discussions. The chair of the board should not be the chair of the audit and risk committee.



- 12.7 The audit and risk assurance committee **must**:
- have written terms of reference;
 - agree an annual programme of work to deliver internal scrutiny;
 - review the ratings and responses on the risk register to inform the programme of work, ensuring checks are modified as appropriate each year;
 - agree who will perform the work;
 - consider reports at each meeting from those carrying out the programme of work;
 - consider progress in addressing recommendations;
 - consider outputs from other assurance activities by 3rd parties including DfE financial management and governance reviews, funding audits and investigations; and
 - have access to the external auditor (and those carrying out internal scrutiny), review their plans and reports and also consider their quality.
- 12.8 Oversight **must** ensure information submitted to the DfE that affects funding, completed by the trust, is accurate and in compliance with funding criteria.
- 12.9 Internal scrutiny can be delivered through a combination of options, including; employment of an in-house internal auditor, a bought-in internal audit service (which cannot be provided by the external audit firm), appointment of a non-employed trustee, and peer review by the CFOO from another academy trust.
- 12.10 The trust **must** confirm (in its annual governance statement) which internal scrutiny options it has applied and why. It **must** also submit a report of internal scrutiny conducted, as part of the submission of its audited annual accounts.