



Finance Policy

Review Summary

Adopted:	March 2017
Review Cycle:	Bi-annual
Last Review:	N/A
Next Review:	March 2019

PURPOSE AND SCOPE

The purpose of this policy and associated procedures is to ensure that the Ted Wragg Multi Academy Trust ("The Trust") maintains systems of financial control which conform to the requirements of propriety and of good financial management.

Academy Trusts are companies limited by guarantee and, under the terms of the Academies Act 2010, exempt charities.

The Trust must comply with the principles of financial control outlined in the Academies Financial Handbook published by the Education Funding Agency (EFA) and the requirements of the Master Funding Agreement (FA) between the Secretary of State of the Department for Education (DfE) and The Trust. (28.02.2013).

The Trust must ensure economy, efficiency and effectiveness in the use of its funds.

This policy includes other specific financial policies which ensure delivery of these principles; anti-fraud policy, declaring business interest, charging and remission, best value, use of credit card, disposal and write off, procurement, virement and whistleblowing.

This policy applies to all Trust Academies, and adherence to its principles and procedures is mandatory for all Trustees, Governors and staff.

1. ORGANISATION

The Trust has defined the responsibilities of each function and person involved in the financial administration of the Trust to provide a framework of accountability in accordance with the scheme of delegation.

1.1. The Board of Trustees

The Board of Trustees has wide responsibilities defined under statute, regulations and the FA. These are set out in the role of the Trust and its governance arrangements. These include:

- Agreeing the long term financial objectives of the Trust;
- Ensuring that Grants from the DfE are used only for the purposes intended;
- Delegating day-to-day financial management of the trust to the CEO;
- Approval of the annual budgets and any material changes;
- Receiving reports on the expenditure against budget;
- Making decisions on actual financial requests from Local Governing Bodies (LGB's) and committees;
- Appointment of external auditors;
- Appointment of internal auditors;
- Reviewing the reports of auditors;
- Authorising contracts according to approved limits;
- Approval of the annual accounts;
- Appointment of the CEO, Chief Executive Officer and Head Teachers / Head of Campus.
- Agreeing the membership of the Local Governing Bodies and Audit and Resources Committee annually including the chairperson;

- Reviewed annually the Finance Policy and Scheme of Delegation;
- Reviewing annually the terms of reference of Audit and Resources Committee;
- Approval of any companies, subsidiaries or joint ventures.

1.2. The Local Governing Bodies

Overall management of each Academy's budget is delegated to the Local governing Body (LGB).

The LGB is supported in this function by the Audit and Resources Committee within the scheme of delegation. Particular responsibilities remain with the LGB;

- Recommendations to the Trust to approve the annual budget plan;
- Ensuring the register of pecuniary interest is kept up-to-date;
- Making decisions on expenditure within approved limits.

1.3. VIREMENT POLICY

The Head Teacher / Head of Campus is permitted to recommend a virement up to a sum of £10,000 to the Director of Finance from a budget. Authority may be given by the Director of Finance without the previous consent of the Local Governing Body or Audit and Resources Committee.

Virements will only be authorised under very strict terms:

- Where an error has been made in setting a budget; or
- Where a decision is made to move a budget between departments due to a reorganisation or change of authority.

A virement will not be allowed to cover a deficit in another department or nominal code.

Where these virement powers are exercised, the details of the budgets affected will be recorded in writing and authorised by the Director of Finance and reported to the next meeting of the Local Governing Body / Audit and Resources Committee.

The Virement Policy responsibility cannot be delegated.

Explanatory Notes:

Virement is the transfer of a budget or part of a budget to another budget.

Virements are cumulative, e.g. two virements of £10,000 cannot be made from the same budget. The £10,000 limit applies to the budget being vired from and not the budget being vired to.

If a new budget is approved by the Local Governing Body / Audit and Resources Committee during the financial year, fresh virements can be made from budgets.

Virement powers should be reconsidered every three years, or when there is a change of CEO or Head Teacher.

1.4. Audit and Resources Committee

The Audit and Resources Committee will meet at least three times annually.

It is appointed by the Trust and provides Trustees with an independent oversight of the Trust's financial affairs.

The Audit and Resources Committee will undertake a quarterly programme of reviews (Internal Audit) to ensure that financial transactions have been properly processed and that controls are operating as laid down by the Trust. A report of the findings from each visit will be presented to the Audit and Resources Committee and the Trustees. Detailed guidance on the transactions to be checked is outlined in the Academies Financial Handbook.

1.5. Internal Audit

The Internal Auditors are appointed by the Board of Trustees (through the Audit and Resources Committee). The main responsibilities of the Internal Auditors are to provide the Trustees with independent assurance that;

- a) The financial responsibilities of the Board are being properly discharged;
- b) Resources are being managed in an efficient, economical and effective manner;
- c) Sound systems of internal financial control are being maintained;
- d) Financial considerations are fully taken into account when reaching decisions;
- e) Providing a report of the findings to the Audit and Resources Committee.

1.6. The Chief Executive Officer (CEO)

The CEO is the designated Accounting Officer has responsibility for the propriety and regularity of the public finances for which they are answerable. The responsibilities are outlined in the Academies Financial Handbook and include:

- a) The initial review and authorisation of the budget;
- b) The regular monitoring of actual expenditure and income against budget;
- c) Ensuring annual accounts are produced in accordance with the requirements of the Companies Act 2006;
- d) Ensuring that the regular reports to the Board are full and accurate;
- e) Authorising orders, payments and awards of contracts within approval limits;
- f) Authorising changes to the Academies' personnel establishment.

The CEO has overall executive responsibility for the Academies' financial activities. Much of the financial responsibility is delegated to the Director of Finance. The CEO has responsibility for;

- Approving new Trust staff appointments within the authorised budgets numbers, except for CEO, Director of Finance, Chief Operating Officer, Director of Performance which must all be approved by the Trustees;
- Approving additional staff at the Schools above the authorised budgeted numbers;
- Agreeing the delegated budget and authorisation responsibility within the Academy;

- Monitoring the regular budget reports and acting on overspends or risk.

1.7. Head Teachers / Head of Campus

The Head Teacher / Head of Campus have responsibility for:

- Approving new Academy staff appointments within the authorised budgets numbers;
- Requesting approval for additional staff at the Schools above the authorised budgeted numbers from the CEO;
- Agreeing the Academy budget with the LGB;
- Meeting with the Central Finance Team to monitor the budget reports regularly and acting on overspends or risk;
- Advising the LGB and Trust regarding overspends and remedial actions.

1.8. The Director of Finance

The Director of Finance works in close collaboration with the CEO and is responsible to the Trustees. The main responsibilities of the Director of Finance are:

- The management of the Academy financial position at a strategic and operational level
- The maintenance of effective systems of financial control;
- Submitting grant applications, reports and returns to the DfE, EFA, the Teacher's Pension Agency and HMRC;
- Ensuring that annual accounts are properly presented and adequately supported
- Overseeing the preparation of monthly management accounts;
- Virement decisions within agreed budgets, within Committees and Local Governing Body (LGB) delegated powers;
- Authorising orders, payments and the award of contracts within agreed limits.

1.9. The Accountant / Central Finance Team

The Central Finance Team work in close collaboration with the Director of Finance. The main responsibilities of the Central Finance Team are;

- The day to day management of financial issues;
- The preparation of monthly management accounts;
- Authorising requisitions and payments within agreed limits;
- Reconciliation of all bank accounts weekly;
- Preparation of the monthly VAT return.

1.10. Academy Staff

Members of the finance team and budget holders have specific financial responsibilities.

All staff are responsible for the security of Academy property, for avoiding loss or damage, for ensuring economy and efficiency in the use of resources and for conforming to the requirements of the Trust's financial procedures.

2. CONFLICT OF INTEREST

It is important for anyone involved in spending public money to demonstrate that they do not benefit personally from the decisions they make. To avoid any misunderstanding that

might arise all Trustees, Governors and staff with significant financial or spending powers are required to declare any financial interests they have in companies or individuals from whom the Trust may purchase goods or services. The register is open to public inspection.

Any member of staff in receipt of gifts or hospitality over a value of £25.00 must declare this to the Finance Office for inclusion on the Gifts and Hospitality Register.

The Trust policy on Gifts and Hospitality can be accessed at:

www.tedwraggtrust.co.uk/wp-content/uploads/2016/10/TWMAT-Gifts-Hospitality-Policy.pdf

The Trust Policy on Declaring Business Interests

It is important that the Trust, Governors and staff not only act impartially, but are also seen to act impartially. The Trust, LGBs, Committees and Academy staff have a responsibility to avoid any conflict between their business and personal interests and affairs and those of the trust and schools. There is a legal duty on all Governors to declare an interest likely to lead to questions of bias when considering any item of business at a meeting and for the governor concerned to withdraw, if necessary, whilst the matter is considered.

The Trust policy on Conflicts of Interest can be access at:

www.tedwraggtrust.co.uk/wp-content/uploads/2016/10/TWMAT-Conflict-of-Interest-Policy-approved-March-2016.pdf

REGISTER OF BUSINESS INTERESTS

Trust & LGBs

To help put this duty into practice, the Trust and LGB is required to establish and maintain a register indicating individuals' business / pecuniary interests. This should include, if appropriate, the company by whom they are employed, directorships, significant shareholdings or other appointments of influence within a business or other organisation which may have dealings with the Academy.

The register includes an entry for all of the Trust, Governors, Associate Members, the CEO, and the Clerk to the LGB and the Clerk to the Trust.

- Individuals should include their own interest and those of any member of their immediate family (including partners) or other individuals known to them who may exert influence.
- The register sheet must be signed and dated by the individual and countersigned by the Chair of the Trust / CEO / Chair of the LGB to indicate that he / she has noted any declarations.
- The Clerk to the LGB should ensure that the register is up to date and complete for their own LGB.
- Dated nil returns are also required.
- The forms must be renewed annually.

- The full register will be kept up to date by the Trust Clerk, on the Trust website and made available on request to the Trust, Audit and Resources Committee, LGBS, CEO, staff, parents, and auditors.
- The form completed by the Chair of the Trust should be countersigned by the CEO.
- The form signed by the CEO should be countersigned by the Chair of the Trust.
- The form completed by the Chairs of the LGBs should be countersigned by the CEO.

The register enables the Trust to demonstrate that in spending public money they do not benefit personally from decisions that they make. The register contains, as a minimum, the elements shown on the attached sheet.

Other staff with financial responsibility

It is also a requirement for all individuals in a position to influence financial decisions within the Trust and schools, to complete a form declaring any business / pecuniary interests. These forms should be countersigned by the CEO to indicate that he / she has noted any declarations. Where a staff member is also a Local Governor, Associate Member of the LGB or is Clerk to the LGB, their form should be countersigned by the CEO.

Opportunity to declare interests at meetings

There is a standing agenda item at every meeting (including committee meetings) called "Declaration of Pecuniary Interest" to allow the Trust and Governors the opportunity to declare ANY interests relating to items on the agenda.

3. INCOME

3.1. Academies are funded on the same basis as maintained schools and receive annual funding allocations from the EFA;

- All schools and academies receive most of their funding based on the total number of students. Student numbers are derived annually from the October school census or the estimated school numbers, in the case of new academies, as stipulated in the funding agreement;
- Academies are funded through the Education Funding Authority (EFA). They receive the same amount of money as the Local Authority (LA) schools in the area. This is calculated using a LA formula. The LA agrees the funding formula factors and rates in consultation with the schools Forum. It incorporates student-led factors such as basic entitlement, deprivation, prior attainment, mobility rates and English as an additional language (EAL). These factors are combined with others based on the institution, such as a lump sum for premises costs. This is the core budget and is received as the general annual grant (GAG);
- The notional Special Educational Needs (SEN) budget for academies is also worked out the same way as for local schools and is received directly from The LA. The formula usually gives more money to schools that have more students on free school meals and those that are not doing so well with English and Mathematics. It is recommended that the notional SEN budget is used to pay for up to £6,000 worth of provision to meet students' SEN. If it can be shown that a student with SEN needs more than £6,000 worth of special educational needs provision, the LA will consider providing top up funding to meet these needs.
- The EFA provides funding for Academies from September to August, in line with the academic year;
- Academies receive extra funding, to cover the cost of services previously provided by the LA. This is allocated through the education services grant (ESG);

- Capital and pupil premium allocations are paid outside the GAG but directly from the EFA. The pupil premium is additional funding given to publicly funded schools and academies in England to raise the attainment of disadvantaged students and close the gap between them and their peers;
- 16-19 funding is received separately, from the EFA. Funding is calculated using a funding formula which incorporates factors such as student numbers, student retention, higher cost subjects, disadvantaged students and area costs. Student number statements are sent out in January and reflect the current situation. These form the basis of the provisional allocation for the following year; lagged funding.

3.2. As part of the reconciliation procedures, the Accountant will ensure that the monthly budget allocations to the Bank Account are made on time by the EFA, and all other relevant agencies.

3.3. The Director of Finance is responsible for ensuring that all other allocations of money due to the Trust are made on time by the EFA and all other relevant agencies.

3.4. The Academies also receive additional income from;

3.4.1. Students; mainly to cover the cost of school meals and educational visits.

Educational opportunities provided at Academies during school hours are available to students regardless of ability to pay and that other activities are charged for in a fair and transparent way.

Students and parents can make payment via the appropriate online payment system which makes collection secure, minimises cash held in the school and ensures income management is efficient.

There are three methods of payment;

- Online via the secure website;
- Using a smart phone;
- In cash

Charging and Remission Policy

In accordance with the Education Reform Act of 1988 and sections 449-462 of the Education Act, 1996 no charges are to be made for any books, materials, equipment or apparatus used during school hours.

The charging policy is applied in line with section 457 of the Education Act 1996 which e.g. allows charges to be made for residential school trips and artefacts made in school and taken home.

Voluntary contributions

Where the Academy cannot levy charges and it is not possible to make these additional activities within the resources available to the Academy, the Academy may request or invite parents to make a contribution towards the cost of the trip or activity. Students will not be treated differently according to whether or not their parents have made any contribution in response to the request or invitation. Where there are not enough voluntary contributions to make the activity viable, then it will not take place.

No student will be disadvantaged as a result of family circumstances. A remissions policy will be applied. The charges may be remitted in part or full as reasonable in particular circumstances.

Remissions Policy

The statutory arrangements for the remission of charges cover parents / carers in receipt of Income Support, Family Credit, Jobseekers' Allowance (payable under the Jobseekers Act 1995) or Disability Working Allowance charges in respect of Board and lodging, materials, and activities outside school hours.

Those parents must receive full remission of Board and lodging charges where the activity takes place out of school hours or the activity is necessary for a prescribed public examination or the National Curriculum. In other circumstances the school can make a contribution, depending on the family circumstances, to the cost of the visit, at the Head Teacher / Head of Campus / CEO's discretion.

The Head Teacher / Head of Campus / CEO may remit in full or part charges in respect of a pupil, as is reasonable in the circumstances.

The Head Teacher / Head of Campus / CEO may decide not to levy charges in respect of a particular activity, if it is reasonable in the circumstances.

Contingency money

This may be included for emergency situations. Where, after the visit, there is a financial surplus, money should be shared evenly between the contributors, unless written agreement has been received to the contrary.

Specific examples of how the charging policy will be applied.

Educational day visits:

- A charge may be levied in respect of day visits that take place during school hours or are part of the curriculum.

Residential visits:

- For those which are essential to the National Curriculum, statutory RE, preparation for prescribed examinations a charge will be levied for Board and lodging.
- For those which are not essential to the National Curriculum, statutory RE, preparation for prescribed examination a charge will be levied for the full cost if the amount of school time is less than half of the total time of the trip. If the amount of school time is half or more of the total time of the trip, a charge will be levied for Board and lodging.

Examination Entries:

- A charge will be levied in respect of examination entries for students where the Academy has not prepared the student for the examination;
- A charge will be levied in respect of examination entries for students where the Academy has prepared the student for the examination and It considers that for educational reasons the student should not be entered and the student's parent / carer wishes the student to be entered (or the student him / herself when over 18

years old). In these circumstances, if the student subsequently passes the examination, the Academy will refund the cost.

- A charge will be levied where a student fails without good reason to complete the requirements of any public examination where the Academy paid or agreed to pay the entry fee.
- A charge will be levied for a student re-sitting an examination

Materials and Textbooks:

- Where a student or parent / carer wishes to retain items produced as a result of art, craft and design, or design and technology, a charge may be levied for the cost of the materials.;
- In the case of Food Technology, students usually provide their own ingredients, however if the student forgets, a charge can be levied if ingredients are provided;
- Textbooks are provided free of charge, however in some subjects, additional revision guides are made available, for which a charge is made.

Music Tuition:

- If an external body provides lessons for small numbers outside of school curriculum and levies charges in respect of individual music tuition, and group music;
- The cost of peripatetic tuition is subsidised by the Academy;
- No charge is levied where music tuition is an essential part of the National Curriculum or a prescribed public examination syllabus followed by the pupil.
- Remission of fees may be available when parents receiving music tuition are in respect of Income Support, Family Credit or Jobseekers Allowance.

Out of School activities:

- No charge will be made for activities outside school hours that are part of the National Curriculum or religious education, or that form an essential part of the syllabus for an approved examination.
- If a student is prepared, outside school hours, for an examination that is not set out in regulations (the full list of which is available from the Academy), a charge will be levied for tuition and other costs.
- For all other activities outside school hours, a charge up to the cost of the activity will be levied.

Damage / Loss to property:

- A charge will be levied in respect of wilful damage, neglect or loss of Academy property (including premises, furniture, equipment, books or materials), the charge to be the cost of replacement or repair, or such lower cost as the Head Teacher / Head of Campus / CEO may decide.
- A charge will be levied in respect of wilful damage, neglect or loss of property (including premises, furniture, equipment, books or materials) belonging to a third party, where the cost has been recharged to the Academy. The charge to be the cost of replacement or repair, or such lower cost as the Head Teacher / Head of Campus / CEO may decide.
- This cost will be recharged to staff, pupils or any person associated with the activity who is found to have caused wilful damage, neglect or loss of property.

Expenses

- The school will expect parents to cover any costs involved in interviews at universities, work experience travelling expenses etc. A small fund will exist to assist families on low income levels. Application for such funding will be dealt with in the strictest confidence and any such application should be made direct to the Head Teacher / Head of Campus.

Sale of items

- Departments throughout the school may purchase items in bulk and sell at cost to pupils. Also, examination revision materials may be sold to pupils at cost

Other charges

- The Head Teacher / Head of Campus or CEO may levy charges for miscellaneous services up to the cost of providing such services e.g. copying a student's file.

3.4.2. The **Parent Teacher Committees** raises extra funds for the Academy used to purchase special items.

3.4.3. The Academies will make their facilities available to outside users at a charge of at least the cost of providing the facilities. **Letting and hire of the Academies** is conducted in line with the Trust Letting and Community Use Policy for each Academy which includes a scale of charges.

3.5. Cash and Cheque Management

Although cash and cheque collection is now kept to a minimum the following procedures apply when it is unavoidable:

- All income received should be recorded immediately and a sequentially numbered receipt issued.
- All income shall be acknowledged by the collector to the payer, this will be by a system generated receipt. A receipt should always be issued for income in accordance with the scheme of delegation.
- When a receipt is issued a copy will be given to the payer and the duplicate copy kept at the Academy.
- All monies received must be banked intact as soon as is practicable.
- All cheques banked must be entered on the bank paying-in slip and recorded;
- For normal day-to-day transactions, the Accountant will be responsible for receiving income and banking of income.
- The Director of Finance or the finance team shall periodically check that all the monies due to the schools have been collected and banked.

Personal cheques will not be cashed from money received and due to the Trust.

The Accountant will ensure that all VAT on income is treated in accordance with the VAT manual.

4. FINANCIAL PLANNING AND REVIEW

The Trust and each Academy will prepare both medium term and short term financial plans.

The plans will be prepared having regard to all known needs of the Trust, the School Improvement Plans and the Asset Management Plan.

The Director of Finance is responsible for working with the CEO, Head Teachers and Head of Campus to draft these.

The Director of Finance is responsible for establishing a schedule which allows sufficient time for the approval process (Audit and Resources Committee, LGBs and Board of Trustees) to ensure that the submission date to the DfE for the resulting annual budgets is met.

The DfE Financial calendar details all the submission dates required.

The annual budgets will reflect the best estimate of resources available to the Trust and Academies for the forthcoming year and will detail how these resources will be utilised. A balanced budget must be set.

The budget must be communicated to all staff with responsibility for budget areas (budget holders) so that everyone is aware of the available resources.

The CEO is responsible for approval by the Board of Trustees.

Monthly reports will be prepared by the Accountant. The reports will detail actual income and expenditure against budget both for budget holders and at a summary level for the CEO, Head Teachers, Head of Campus, CEO, Governors and Trustees.

The monitoring process should be effective and timely in highlighting variances so that differences can be investigated and action taken.

5. ACCOUNTING SYSTEMS

5.1. Accounting system

All the financial transactions of the Academy must be recorded on the Civica accounting system. The Civica system is operated by the Finance Team.

5.2. Civica Administration

The Civica software allows users to be set up with appropriate access levels. The Civica system restricts the access to the Nominal and Accounts depending on the roles of the Web users. The Budget holders are given access to authorise requisitions entered against the accounts that they are responsible for. The access to the Budget Holder reports available for viewing on the web portal is controlled by Civica.

5.3. Transaction Processing

All transactions must be authorised in accordance with this policy.

5.4. Transaction Reports

The Director of Finance will obtain and review system reports to ensure that transactions are posted to the accounting system correctly. The reports obtained and reviewed will include:

- Periodic audit trail reports.
- Amendment reports for the purchase ledger, sales ledger and nominal ledger
- Management accounts summarising expenditure and income against budget at budget holder level

5.5. Reconciliations

The Accountant 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
- Bank Accounts
- Payroll control account
- Petty cash control account
- Credit card accounts
- VAT control account

Suppliers will routinely be encouraged to provide bank information and payments will be made by BACS transfer. If a cheque run is required the payments will be processed after authorisation by the Director of Finance before the printing of the cheques. These are subsequently signed in accordance with the bank mandate.

A complete audit trail is maintained on the Civica accounting which is routinely reviewed by the Director of Finance.

6. BEST VALUE STATEMENT

The Trust is committed to achieving Best Value for money from all purchases. A large proportion of purchases will be paid for from public funds and must comply with the principles of:

- **Probity**; it must be demonstrable that there is no corruption or private gain involved in the contractual relationships;
- **Accountability**; public accountability for expenditure and the conduct of its affairs;
- **Fairness**; that all are dealt with fairly and equitably.

The principles of Best Value are applied to securing continuous improvement and will ensure:

- All services are of a high quality that provide good value for money, meet the needs of their users and contribute positively to the general ethos of the school;
- Resources are deployed to secure the continuous improvement in the means through which the Academies functions are exercised;
- All expenditure is relevant to the School Improvement Plan and is regularly reviewed;

- Due consideration has been given to Post OFSTED Inspection Plans (if applicable) in compiling the school budget;
- All premises / supplies and services' contracts agreed by the Academies are reviewed periodically to ensure they are the most effective, economic and efficient that are available;
- The Trust aims to ensure that it is a well-managed organisation that supports and values the contribution made by its workforce.

Appropriate authorisation limits are reviewed annually and approved by the Trust.

7. PURCHASING

7.1. Procurement

All academies and maintained schools must carry out procurement as part of their daily activities.

Procurement is the term used to describe the whole process of buying anything. This includes the first step of identifying what it is that you need, finding out what different suppliers can offer you, and then choosing, purchasing and using your goods or managing your services, right through to disposing of the used goods, or the end of the contract.

Academies and maintained schools, rely on public funding to carry out their work and meet their objectives. As such they have to understand and follow basic procurement rules whenever they spend that money. These rules aim to ensure that taxpayers' money is used in ways that are demonstrably open, fair, and good value.

Understanding and following these rules and guidance will provide protection from being criticised for wasting public money or using it inappropriately. It will give all suppliers an equal opportunity to seek business and make competitive offers, and ensure that spending choices and decisions are transparent and defensible.

Poor procurement skills impact on the academy's ability to meet its objectives – bad spending decisions mean that the total budget simply won't go as far as it can and should. But they can also result in legal challenges, cancellation of contracts, financial penalties and damages, and loss of reputation. Suppliers who compete unsuccessfully for business can be especially keen to challenge the legality of the procurement process.

Good procurement is simply a mix of common sense, planning upfront, and knowing and following the basic UK and EU legal requirements governing all public sector spending. From basic everyday purchases to the most complicated and costly one-off decisions - the key elements of good procurement are:

- Planning - taking the time up-front to get the information needed to make a good, informed decision
- Information – knowing and understanding the basics – such as the legal requirements that must be followed for any high-value spending
- Common sense - good judgment: for example, allocating more time to one-off high-value purchases, recognising when further help and advice is necessary, or having the confidence and experience to make the decisions. Procurement can range from the everyday, low-value purchases such as classroom supplies and cleaning products, right up to the highest-value, one-off purchases – a major refurbishment project, or letting a three-year contract for catering services. It will

not be possible to subject every procurement process to the same level of scrutiny. The more public money being spent, the tighter the controls you need to apply.

Public procurement regulations cover three categories of spend:

- Goods – the term for actual products being purchased, such as stationery, equipment (e.g., IT, catering, furniture), vehicles
- Works – this refers to any building work, including new buildings, extensions, refurbishments or repairs.
- Services – the skills and expertise provided by individuals or companies. Examples include: IT installation and maintenance, catering services, grounds maintenance.

All public sector procurement - including schools and academies - must comply with the European Procurement Directive, which has been fully ratified into UK law. These Regulations are legally binding on anyone responsible for spending public funds, to safeguard the fair competition principles set out below.

UK procurement law protects five key principles:

- **equality** - all suppliers bidding for public sector contracts must be treated equally.
- **non-discrimination** - do not discriminate directly or indirectly against suppliers from another European Union state, or their workers.
- **transparency** – all procurement of a sufficiently high value must be advertised, to make it possible for suppliers from across the EU to find out about the work and, potentially, bid for it.
- **mutual recognition** - all European countries must recognise professional qualifications, technical standards and similar accreditation issued by other Member States;
- **proportionality** - the means should be proportional to the ends.

The principle of proportionality also applies to an academies procurement activities. To help decide what steps are appropriate for different values of spending, schools, academies (and other public bodies) need to set and use procurement thresholds – financial limits, with the required procurement protocols set out and agreed for each item of expenditure below or above each threshold detailed in Appendix 1:

The Trust policy on Competitive Tendering can be accessed at:

www.tedwraggtrust.co.uk/wp-content/uploads/2016/10/TWMAT-Competitive-Tendering-Policy-approved-March-2016.pdf

7.2. Routine Purchasing

7.2.1. Budget holders will be informed of the budget available to them at 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. Online access to actual spend and committed versus budget will ensure this.

7.2.2. Purchase invoices can originate in the two streams;

- **Through the Purchase Ordering process** - This will be the standard purchasing process

- **Not through the Purchase Ordering process** - This will be used for such expenditure as rent, rates, utilities (i.e. water, gas, electricity and telephone), payments against buy back agreements (i.e. payroll provider, EWO services etc.).

7.2.3. Ordering

a) **Civica Financial Web portal**

A Purchase Order must be raised for all goods and services, excluding utilities and services identified above.

The requisitions are entered on the web portal by the budget holder or departmental assistants against the cost centre and product codes assigned to them. The list of authorised suppliers is controlled by the Finance staff and new suppliers are added on the approval of the Director of Finance following appropriate due diligence checks. The web portal allows quotations and information supporting the orders to be attached to the order via a shared drive.

Confirmation of the receipt of goods or services is required to enable payment of any invoice.

Suppliers will be advised that invoices should be sent to the Central team by email wherever possible.

The goods will be receipted on the Civica Financial Web portal, which will authorise an invoice for payment.

The Web portal gives a Budget Holder report in real time including actual to date, commitments, budget and balance remaining.

b) **Civica Financial Distribution**

This determines the work flow and routes the requisition to its following stages in accordance with criteria pre-set on the Civica Financial system – ability to create, move, amend or view only. The facility to undertake budget checks before orders are committed can be switched on via the Civica Financial Distribution. The initial status of each user determines at what stage of the work flow the users can join the ordering process:

- Requisition raised (REQ)
- Requisition authorised (REQAUT)
- Purchase Order Requisition (POREQ)
- Purchase Order Authorisation (POAUT)
- Delivery notes (GRN)
- Invoice (INV)

The Requisitions (REQ) are raised by the departmental assistants and are converted to authorised Requisitions (REQAUT) with approval of the budget holder. When the Finance staff are satisfied that the supplier is appropriate; the correct nominal and account has been used; that there is adequate budgetary provision and that quotations have been obtained if necessary they convert the requisition to a Purchase Order (POREQ).

The authorisation of a Purchase Order (POAUT) is restricted to the Head Teachers / Head of Campus / Director of Finance and CEO.

Confirmation of the receipt of goods or services (GRN) is required to enable payment of any invoice (INV). The goods will be receipted on the Civica Financial Web portal, which will authorise an invoice for payment. Confirmation of goods received must not be made by the officer who has raised the original order.

Suppliers will be advised to send invoices to the Central Finance Team who will ensure that they are input to the system. When the invoice is authorised there must be a separation of duties as the budget holders must sign the Invoice (INV) as confirmation that goods and services have been received. All invoices must be coded with reference to any assets purchased so that they can be recorded on the asset register.

If discounts are available for prompt payment, then payments can be made immediately, having taken into account any loss of interest that might arise.

If any goods are rejected or returned to the supplier because they are not as ordered or are of sub-standard quality, the Finance Office should be notified. The Finance Officer at the schools must keep a central record of all goods returned to suppliers and advise the Central Finance Team so that the invoice is not paid.

If the invoice and GRN agree to the order then the invoice will be arranged for payment within the Trust payment terms. Before signing the invoice the budget holder must make a detailed check against the order and the GRN and these documents must be attached to the invoice before it is sent back to the Finance Office for processing. Budget holders must undertake these checks without undue delay and in any case within seven working days of invoice receipt.

Invoices received without an appropriate order number indicated on the invoice will be returned to the supplier. If no order has been raised then the Academy may refuse to authorise payment for these goods or services.

The workflow ensures that without the necessary authorisation at each stage of the purchasing process, by the approved staff, that the order will not progress to the next level.

c) Civica Financial

This controls the email notification to the staff when requisitions are entered on the web portal based on the rules and criteria predetermined. The Budget holders receive email alerts when requisitions are entered against their budgets and if approved the Finance Office staff in turn receive email notification of its authorised stage. Cancellation or non-approval or part approval is similarly communicated via the email with the supporting comments.

The system has financial limits for order authorisation and has facility to set dual / triple authorisation for large orders.

The authorised orders and sales Invoices are communicated to the Suppliers and Customers by email by the School Finance Officers.

Remittance advices are sent to suppliers electronically once the BACS payment is processed.

d) **Cheques**

Cheques will only be processed in exceptional circumstances. The process is as follows:

- The cheque signatories are any two from the Trust's mandate and in accordance of the regulations contained in the scheme of delegation.
- All cheques must be signed within 24 hours of the Director of Finance notifying the signatories that the cheques have been raised.
- It is accepted that it is good practice for the person originating the cheque not to be one of the signatories on the cheque.

The Accountant is designated to control cheques and must ensure that:

- all cheques are securely stored;
- all cheques are entered correctly on the financial management system;
- spoiled cheques are marked as cancelled and retained;
- minimum re-order levels are established;
- a system of periodically ensuring that all cheques are properly accounted for, i.e. they are still in stock or have been used;

If discounts are available for prompt payment, then payments can be made immediately, having taken into account any loss of interest that might arise. If not, cheques will be issued in accordance with the trading terms of the individual contractor or supplier.

Due regard must be taken of the Late Payments of Commercial Debts (Interest) Act 1998 and Public Contracts Regulations (2015) which states that invoices must be paid within 30 days.

The Accountant must ensure that all prime records are retained for six financial years current year and stored in a secure cabinet (or similar) in a secure and logical manner.

A copy of the computer-generated schedule of cheques will be retained within the Finance Department. Original invoices must be marked to ensure duplicate payments are not made, together with details of the cheque number, date sent etc.

Copy invoices are not to be paid until exhaustive checks have been made to confirm that payment has not previously been made. References back to the original order are to be made in every case.

Confirmation that such checks have been made is to be by endorsing the invoice "invoice not previously passed for payment" and signing.

Under no circumstances are payments to be paid against Proforma invoices or statements to suppliers.

8. BANK ACCOUNTS

The opening of all accounts must be authorised by the Board of Trustees who must set out, in a formal memorandum, the arrangements covering the operation of accounts, including any transfers between accounts and cheque signing arrangements.

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

The Trust's bank and / or building society must be informed that the Trust's accounts must never become overdrawn.

Where the cash flow position is such that the bank account might become overdrawn, then the CEO has the authority to request from the EFA an early advance of the monthly budget allocation. Confirmation that such a request has been made must be notified to the Director of Finance, Trust, Chairperson of the Audit and Resources Committee at the next meeting, together with an explanation as to the reasons why and the additional cost to the Trust in terms of interest charged.

The Trust will maximise income as far as possible and, where appropriate, a high interest or deposit account will be maintained, in addition to the normal current account.

Surplus balances are transferred to a high interest or deposit account every night.

Direct Debits and Credits will only be made with the authorisation of any two signatories from the Trust's mandate.

For any Direct Debit or Credit authorisation over £5,000, then one of the signatories must be the CEO.

9. PAYROLL

The main elements of the payroll system are:

- Staff appointments;
- Payroll administration and payments

As part of the annual budget process The Board of Trustees will approve a staff establishment for the Trust and Academies.

The CEO and the Head Teachers / Head of Campus have the authority to appoint staff within the authorised establishment, including supply staff, except for the CEO, Chief Operating Officer, Director of Finance and Director of Performance whose appointments must be approved by the Trustees.

Increases to the staff numbers can only be made with the approval of the CEO who must ensure that adequate budgetary provision exists for the proposed change.

Changes to staff pay can be recommended by the Head Teacher / Head of Campus and approved by the LGB. Central Services staff changes to pay are approved by the Trustees.

New appointments, any subsequent amendments to an employee's terms of employment and terminations of employment will be notified to the pay provider by the required means.

Staff overtime, and supply claims can be approved by the Head Teacher / Head of Campus / Director of Finance or CEO.

The monthly payroll must be approved by the Director of Finance.

The Director of Finance will ensure that the staffing spread sheets are up dated to take account of new appointments, amendments, terminations of employment overtime and supply claims.

Any payroll transaction relating to the CEO can only be authorised by the trust.

10. CREDIT CARD USE

A limited number of credit cards will be issued for small value transactions. Use of charge cards and / or credit cards will be allowed in accordance with The Trust regulations.

Trust & Academy credit cards can be used for purchasing online.

- An order should be raised and entered on the system in the usual way.
- Credit cards should only be held by authorised card holders and should be retained on the school premises at all times.
- Monthly statements should be checked and all documents supporting the payments should be retained with the statement.
- All charge cards should be held in a safe and signed for if being used off site.
- Accounts must be reconciled and balanced to receipts on a monthly basis.

Card transactions will be kept to a minimum and only used after every attempt has been made to look for suppliers who would accept online payments.

Every request for a new card needs to be authorised by two of the authorised signatories in accordance with the bank mandate before processing.

Following authorisation the request is processed by the Director of Finance or Accountant.

The cards have a spend expenditure limit of £500.

No cash withdrawals are permitted on the card.

Credit card use and limits will be reviewed annually.

10.1. Use of Credit Card Policy

The card must only be used for procuring goods and services from suppliers who are unable to accept BACS payments. Every attempt will be made to look for alternative suppliers who would accept payments by cheque and the card transaction will be the "last resort" and kept to a minimum.

Credit cards shall be used for the payment of valid business expenses only, and the misuse of such cards shall be grounds for disciplinary action.

The Budget holders must request the card holders and sign to approve the purchase before the goods / services are ordered. The approval should include a reason for the purchase, why the purchase cannot be made using normal purchase orders and relevant account coding.

The cards can be used over the phone, fax or secure internet site (PayPal, Sage-pay or other approved signs) and all controls that would apply to a normal transaction are to be adhered in the usual way.

If there is a problem with the goods or services supplied the supplier must be contacted immediately for a refund into the card or to obtain replacement.

The monthly card statement received from the Bank should be reconciled against the card transactions and all supporting documents (order, card usage form, delivery note, receipt and invoice) presented to the card holder for initial approval and then to the CEO / Head Teacher or Director of Finance for scrutiny and then if necessary to the CEO for authorisation.

A direct debit arrangement has been set up to clear the card balance in full at the end of each month.

The card has a spend expenditure limit of £5,000 (represents two months' worth of transactions) and a single transaction limit of £500. No cash withdrawals are permitted on the card.

The Trust will fall under the central VAT registration and will therefore apply the relevant VAT codes to each financial transaction in accordance with the VAT manual and guidelines.

10.2. Petty Cash

- a) Minor items of expenditure can be paid or reimbursed to staff through the Academy's own petty cash system.
- b) Expenditure paid through petty cash must not exceed £30 in any one transaction. Requests for amounts above this limit can only be authorised by the Director of Finance.
- c) All payments made must be supported by an appropriate VAT voucher signed by the member of staff receiving the cash.
- d) All petty cash will be kept in a locked box in the safe and the Finance Officer will be responsible for its security.
- e) The amount of petty cash held in each Academy must be kept to a minimum and should never exceed £100 at any one time. The maximum amount of cash held in the academies at any time must never exceed the insured limit for the safe as set by the academies' insurance cover.
- f) The Accountant will be responsible for the monthly reconciliation of the petty cash at the end of the month and entry onto the Trust's financial system. Receipts less payments plus cash in hand should equal the imprest after taking into account the cash brought forward from the previous month.
- g) Any special arrangements for obtaining petty cash must be notified to the Director of Finance for agreement.
- h) If there is a problem with the goods or services supplied the supplier contacted immediately for a refund or to obtain replacement.

11. FIXED ASSETS

11.1. Inventory / Asset Register

Trustees recognise the need to maintain an inventory of equipment in the Trust in order to:

- Ensure that staff take responsibility for the safe custody of assets;
- Enable independent checks on the safe custody of assets;
- Ensure proper physical control of equipment;
- To provide an up-to-date record of the equipment available for teaching purposes;

- To manage the effective utilisation of assets and to plan for their replacement;
- To provide a basis for insurance cover and claims if equipment is damaged or destroyed, e.g. by fire, theft, vandalism or other disaster;
- To enable external auditors to evaluate the annual accounts and the Academies' financial position

11.2. All items of equipment satisfying the conditions below must be both visibly and invisibly marked with the name and postcode of the Academies. As and when they are received entries will be made in the inventory for:

- Items valued at £1000 or more at the time of purchase, either individually or as a set;
- attractive and portable items;
- items especially considered by the Head Teacher / Head of Campus as being worth including;
- IT equipment can only be disposed of by the Central IT Manager.

11.3. The inventory will be maintained by the Director of Finance.

11.4. The school inventories will be checked annually by the Head Teacher / Head of Campus and certified correct. All discrepancies are to be notified to the CEO or Director of Finance immediately.

11.5. All disposals should be recorded promptly, showing the method of disposal and the authority for such action. The Central Finance Team must be informed by email of:

- Details of the asset disposed of;
- Any asset number;
- Value received for the asset;
- Date of disposal
- Name of person the asset has been transferred to.

11.6. Disposal and Write off Policy

11.6.1. Disposals

The Head Teacher / Head of Campus is authorised to dispose of surplus, damaged or scrap stock, materials or equipment, excluding IT equipment, on the best possible terms, where the estimated realisable value of the materials does not exceed £1,000. Where the estimated realisable value exceeds £1,000, the approval of the CEO or Director of Finance and LGB shall be obtained;

If the estimated realisable value of the materials is in excess of £50 but does not exceed £1,000, the proposed disposal shall be advertised on the staff notice board or by email and staff will be invited to submit sealed bids for the items.

11.6.2. Write offs

The Head Teacher / Head of Campus is authorised to write off any debt owing to the Academy up to a value of £500 for any one item, provided that he / she is satisfied that

proper steps have been taken to mitigate the loss and prevent a recurrence. This may, for example, be in respect school meals debts; letters; damage to the school or contents; charges levied by the school (e.g. music tuition).

Any debt in excess of this must be reported to the Director of Finance for approval and can only be written off after approval is given by the Trustees.

Records of write offs shall be kept.

11.7. Loan of Assets

A separate "Register of Items removed from the school site" shall be kept for all items loaned to members of staff and pupils, and all items taken off school sites for any reason shall be entered. In the event of any items not being on site when the inventory is checked, reference shall be made to this register in the first instance.

If assets are on loan for an extended period or to a single member of staff on a regular basis the situation may give rise to a 'benefit-in-kind' for taxation purposes.

11.8. Depreciation

The Trust will depreciate fixed assets in line with recognised accounting standards, DfE guidelines and external auditors.

12. INTERNAL CONTROL

12.1. The Accountant is responsible for carrying out the monthly bank statement reconciliation within one week of receipt. All discrepancies are to be reported to the Director of Finance and the Bank and investigated immediately.

12.2. The Director of Finance is responsible for completing the quarterly VAT returns in the prescribed format and forwarding them to the DfE if requested.

12.3. The Director of Finance will be responsible for periodically checking and signing to confirm the checks have been made for both the Delegated Budget and school funds:

- bank account reconciliations
- system reconciliation
- VAT returns
- Petty cash reconciliations
- the appropriateness of payment arrangements in the context of maximising cash flow
- The use and authorisation arrangements of Direct Debits / Credits

12.4. The Director of Finance is responsible for regularly checking and signing to confirm the checks have been made of payments to monitor that:

- transactions have been properly authorised
- no payments have been made which could be classified as fee payments to individuals
- where appropriate, the requirements of the Construction Industry Tax Deduction Scheme have been complied with

12.5. The Trust should provide their Audit and Resources Committee with a schedule of financial responsibilities on appointment; and agree a pattern of working to assure Trustees / LGB that all appropriate internal controls are in place and being adhered to. The Audit and Resources Committee will perform these duties on behalf of each school and report their findings to the Trust CEO.

12.6. The income and expenditure report will be issued to the CEO on a monthly basis.

12.7. The Trustees report will be produced annually.

13. ANTI FRAUD POLICY

Introduction

13.1. Fraud, bribery, corruption, or other dishonesty, would adversely affect the Trust's reputation and put at risk its ability to achieve its objectives by diverting resources from the provision of education for the students.

13.2. The purpose of this policy is to confirm the academies commitment to preventing and detecting fraud, bribery and corruption.

13.3. The Fraud Act 2006 came into force on 15th January 2007. The Act created a single offence of fraud and defined this in three classes:

- False representation.
- Failure to disclose information where there is a legal duty to do so.
- Abuse of position.

13.4. The Act also created four new offences of:

- Possession of articles for use in fraud.
- Making or supplying articles for use in fraud.
- Obtaining services dishonestly.
- Participating in fraudulent business.

The Fraud, Bribery and Corruption Policy document applies to Trustees, Governors and all employees (full time, part time, temporary and casual) of the Trust and its academies.

Responsibility

The Trust aims to have in place efficient and effective systems of control that as far as possible prevent potential fraudsters from exploiting weaknesses.

The LGBs are responsible for ensuring there are strong and effective arrangements in place for managing the risk of fraud and ensuring the academy's interests are safeguarded, including its reputation.

Risk is managed through the existence and application of appropriate policies and procedures. The wide range of procedures in place to minimise the risk of fraud constitute a major part of the system of Internal Control, which is designed to ensure an academy conducts its business properly and effectively and completes its transactions fully, accurately and properly.

The responsibility for anti-fraud arrangements is widely dispersed. Trustees have to give clear support to the arrangements. The LGBs and Head Teacher / Head of Campus

must provide strong leadership by advocating the academy's arrangements and supporting strong action when these are ignored.

The importance of a positive culture towards anti-fraud, bribery and corruption cannot be overstated. The effectiveness of the Trust's policy can be undermined by a culture that does not apply the public standards and supporting procedures routinely on a day to day basis. Maintaining appropriate arrangements, continually advocating them and taking robust action where they are not applied all help to build the right underpinning culture.

Key Procedures and Controls

The following key procedures and controls operate within the Trust:

- The Trust has an effective Anti-Fraud, Bribery and Corruption Policy and Strategy, and maintains a culture that will not tolerate fraud, bribery or corruption;
- Trustee, Governors and employees comply with respective Codes of Conduct;
- Risk Management procedures are in place;
- A Register of Interests is maintained to enable Trustees, Governors and employees to record any financial or non-financial interests that may bring about conflict with the school's interests;
- A Register of Gifts and Hospitality is maintained to enable Trustees, Governors and employees to record gifts and hospitality either received, or offered and declined, from contractors and suppliers;
- Confidential Reporting (Whistle blowing) procedures are in place and operate effectively;
- Suitable and enforced financial and contract procedure rules are in place;
- There are robust recruitment and selection procedures
- There are clear and active disciplinary arrangements;
- Sanctions are pursued against those who commit fraud, bribery and corruption.

The Trust maintains a continuous overview of its arrangements for managing the risk of fraud. A regular review of the Policy is carried out and the documents are revised as appropriate to reflect any key changes and to incorporate current best practice.

The Trust expects that the individuals and organisations with which it deals (e.g. partners, suppliers, contractors, and service providers) will act with integrity and without thought or actions involving fraud, bribery and corruption. Where relevant, the Trust will include appropriate clauses in its contracts about the consequences of fraud, bribery and corruption. Evidence of such acts is most likely to lead to a termination of the particular contract and will normally lead to prosecution.

In assessing the effectiveness of its arrangements, the Trust will monitor the extent to which:

- key personnel are trained in detecting and investigating fraud;
- identified incidents are investigated;
- perpetrators are robustly dealt with;
- the school responds to identified weaknesses in its systems and controls;
- there is any trend in incidents experienced;
- perpetrators are prosecuted;
- recovery of losses is sought.

Audit

The Audit and Resources Committee and internal audit procedures are a key element of the Trust's control system. Internal audit carries out a risk based series of audits designed to assess the school's identification and management of fraud risks. The external Audit Team provides an independent appraisal of the integrity of all internal control systems.

Raising concerns

It is the responsibility of the Trustees, Governors, CEO, Head Teacher / Head of Campus and employees to prevent and help detect fraud, bribery and corruption. In high risk areas specific controls aimed at preventing and detecting frauds will be in place.

Governors, CEO and Director of Finance have a duty to inform the Board of Trustees and the Audit and Resources Committee of any potential fraud, bribes, corruption or other suspected irregularities.

The Director of Finance will ensure that a log is maintained of all reported incidents at the school which will be reported to the Trustees. Any incidents above £5000 will be reported to the EFA

A decision will then be made as to who is best placed to investigate any concerns raised. The investigating officer also has the responsibility to report all findings to the Audit and Resources Committee.

It is often the alertness of employees and the Public that enables frauds to be detected. In accordance with the Whistleblowing Policy, any member of staff with any concerns about the Trust or its academies' activities should normally raise concerns through their immediate manager or senior management. However, it is recognised that this may not be possible in certain circumstances. In these cases, contact should be made with the Chair of the Trust or the Audit and Resources Committee; the CEO or the Director of Finance as appropriate. Concerns may also be raised with the Trust's External Auditor.

All concerns, reported by whatever method, will be treated in confidence and will be reviewed and investigated by the person deemed to be appropriate and best placed to do so. This may mean that, depending on the level, type and details of the concern raised, that concerns are investigated by the Trust, internal audit or in the case of very serious concerns, the External Auditor or the Police.

The Fraud, Bribery and Corruption Policy is available on the Trust website.

14. ALLOWANCES AND EXPENSES

14.1. Trustees' and Governors' Allowances

Section 36(5) of the Education Reform Act 1988 enables governing bodies to decide whether they wish to pay travelling and subsistence allowances from the Trust budget to individual members of the Trust & Governing Bodies. It is expected that members will wish to minimise the level of expenses.

The policy of the Trust in respect of payment of allowances will be reported to DfE as part of the Annual Accounts.

The Trust has agreed that subsistence and travelling expenses may be paid to all Trustees / Governors. Actual expenditure claimed must be supported with receipts, whatever the expenditure.

The claims will be processed in the Finance Office and payment sent to the Trustee / Governor. All records of claims and payments must be kept together.

All records and papers relating to payment of Trustees and Governors expenses will be retained in the Trust for six financial years plus the current year in a secure and logical manner.

14.2. Staff Expenses

Staff may claim for reasonable expenses incurred to perform their duties. Reasonable expenses include:

- Travel by public transport (excluding home to work travel);
- Use of own car and parking (excluding home to work travel);
- Unavoidable overnight accommodation;
- Reimbursement for the purchase of approved items.

Rates and allowances are laid out in the Expenses Policy on the Trust website and are reviewed annually.

Actual expenditure claimed must be supported with receipts, whatever the expenditure.

The claims will be processed in the Schools Finance Office and monitored to ensure compliance. Payment will be made through the payroll monthly.

The Trust Expenses Policy can be found on the Trust website.

15. WHISTLEBLOWING

15.1. Purpose

The Academy is committed to the highest standards of openness, honesty and accountability. It encourages employees to raise promptly any serious concerns they may have about the activities of employees, Governors, or external organisations in relation to their dealings with the Academy. This policy:

- Enables employees to raise their concerns and to receive feedback about the outcome of any ensuing investigation but not the detail of the investigation nor any actions taken;
- Allows employees to take the matter further if they are dissatisfied with the response;
- Protects employees from reprisals or victimisation for 'whistleblowing' made in good faith.

The Trust Whistleblowing Policy can be found on the Trust website.

APPENDICES

APPENDIX 1

Delegated authority Levels

1. Purchase Orders

Goods/Works/Services	Procurement Process
Estimated Value of the Procurement	
£0 to £4,000	Head teacher / Head of Campus or authorised deputies to arrange directly. One quotation (email/written) should be obtained and documentation held on file. Good practice to seek most favourable prices and terms by obtaining more than one quotation.
£4,001 to £10,000	Head teacher / Head of Campus or authorised deputies to arrange directly. Two quotations (email/written) should be obtained and documentation held on file. Good practice to seek most favourable prices and terms by obtaining more than two quotations.
£10,001 to £50,000	Offer the opportunity to at least three Suppliers via formal written quotations. Documentation must be held on file. Such expenditure to be reported to the Trust Audit and Resources Committee
£50,001 to EU Spend Threshold	Advertised invitation to Tender. Documentation must be held on file. Expenditure to be authorised by the Trust Audit and Resources Committee.
EU Spend Threshold and Above	Advertised invitation to Tender. Procurement process to be run in accordance with the Public Contract Regulations 2015. Documentation must be held on file. Expenditure to be authorised by the Trust Audit and Resources Committee.

Trust Purchase Orders must be signed by CEO, Chief operating Officer, Director of Finance or Technical Systems Manager.

The current thresholds for Purchase orders can be found on www.tedwraggtrust.co.uk/wp-content/uploads/2016/10/TWMAT-Competitive-Tendering-Policy-approved-March-2016.pdf

2. Purchase Invoices

All Purchase invoices, not approved directly using GRN process, up to £5,000 must be authorised by the Head Teacher / Head of Campus, or their designated deputy, providing they do not exceed the available budget and a Purchase Order has been raised before receipt of the Goods or Invoice.

Purchase invoices over £5,000 must be signed and then forwarded to the Director of Finance, Chief Operating Officer or CEO for final authorisation.

Any Invoices, other than utilities, which do not have an order raised before receipt of invoice must be forwarded to the Director of Finance or Chief Operating Officer for approval.

3. Grant Claims

All Grant applications must be processed through the Director of Finance and Chief Operating Officer, who will check the calculations and the application details.

All Grant Claim forms must be signed off by the Chief Operating Officer and Director of Finance.

4. Sales Invoices

- All Sales invoicing must be processed through Civica.
- No invoices for the Multi Academy Trust should be sent out as Proforma or manual invoices.
- Nursery bills should be processed monthly.
- Debts must be chased as soon as they become overdue and any debts of more than 2 months must be reported to the Central Finance Team who will organise chasing correspondence.
- Letters will be sent out in the following process:
 - 1st Letter immediately after the due date;
 - 2nd letter within 2 weeks of the first;
 - 3rd and final letter, threatening legal action within 1 2 months of the original invoice date.
- If there is no response to the 2nd letter the Central Finance Team will send the final letter and arrange for legal action if appropriate.

5. BAC Payments

BACS payments must be authorised in line with the Bank approval letter.

All payments must only be authorised by two of the following:

Accountant – 1st signatory only
Director of Finance
Chief Operating Officer
CEO

Adoption of the Policy

This Policy has been adopted by the Trustees of the Ted Wragg Multi Academy Trust.

Signed
(Chair of Trust)

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Date 22 March 2017