Policy name	Finance Policy & Procedures
Member of Staff Responsible	NFA
Issue Status/Date	25 June 2026
Review Date	Summer Term 2027
Signed	Chair of FRA Committee

Penrose Learning Trust comprises of:

Claydon High School
Colchester Academy
East Bergholt High School
Hadleigh High School
Claydon Primary School
Elmstead Primary School
Frinton-on-Sea Primary School
Great Bentley Primary School
Dale Hall Community Primary School

Circulation:	SamPeople	GovHub	Trust Website	School Website

Contents

1. Introduction

1.1 The purpose of this manual is to ensure that Penrose Learning Trust maintains and develops systems of financial control which conform to the requirements both of propriety and of good financial management. It is essential that these systems operate properly to meet the requirements of our funding agreement with the Department for Education (DFE).

1.2 Penrose Learning Trust must comply with the principles of financial control outlined in the academies guidance published by the DFE. This manual expands on that and provides detailed information on Penrose Learning Trust's accounting procedures and system manual should be read by all staff involved with financial systems.

1.3 Any forms or templates referenced in this document will be available on the Penrose Learning Trust intranet or directly from the Central Finance Team.

2. Organisation

2.1 Penrose Learning Trust has defined the responsibilities of each person involved in the administration of the Multi Academy Trust (MAT) finances to avoid the duplication or omission of functions and to provide a framework of accountability for Trustees and staff. This delegation is to follow the Scheme of Delegated Authority for Penrose Learning Trust. The financial reporting structure is illustrated below:

The Trustees

2.2 The Trustees have overall responsibility for the administration of the MAT's finances. The main responsibilities of the Trustees are prescribed in the Funding Agreement between Penrose Learning Trust and the DFE and in the MAT's scheme of delegation. The main responsibilities include:

- Ensuring that grants from the DFE are used only for the purposes intended;
- Ensuring funds from all other sources including the local authority are accounted for correctly and are used only for the purposes intended;
- Approval of the annual budget;
- Approval of the annual financial statements
- Appointment of the CEO

The Finance, Risk and Audit Committee

2.3 The Finance, Risk and Audit (FRA) Committee is a committee of the Trustees. The FRA Committee meets a minimum of once per term, but more often, meets half termly. More frequent meetings can be arranged if necessary.

2.4 The main responsibilities of the FRA Committee are detailed in written terms of reference which have been authorised by the Trustees. The main responsibilities include:

- The initial review and approval of the annual budget;
- The regular monitoring of actual expenditure and income against budget;
- Ensuring the annual accounts are produced in accordance with the requirements of the Companies Act 1985 and the DFE guidance issued to academies;
- Authorising of transactions in accordance with the Scheme of the award of contracts over £50,000 (if not included within the planned school budget);
- Authorising changes to the MAT personnel establishment and
- Reviewing the reports of the Responsible Officer on the effectiveness of the financial procedures and controls. These reports must also be reported to the full Trustees.

The CEO

2.5 Within the framework of the Penrose Learning Trust business plan as approved by the Trustees, the CEO, as Accounting Officer, has overall executive responsibility for Penrose Learning Trust's activities including financial activities. Much of the financial responsibility has been delegated to the DCEO-C but the CEO still retains responsibility for:

- Approving new staff appointments, except for any posts which the Trustees have agreed should be approved by them in line with the scheme of delegation;
- Authorising supplier contracts in conjunction with the DCEO-C.
- Authorising electronic payments in conjunction with the DCEO-C or other authorised signatory.

Deputy CEO – Corporate (DCEO-C)

2.6 The DCEO-C works in close collaboration with the CEO through whom he or she is responsible to the Trustees. The DCEO-C also has direct access to the Trustees via the FRA Committee. The main responsibilities of the DCEO-C are:

- The day to day management of financial issues including the establishment and operation of a suitable accounting system;

- The management of the MAT financial position at a strategic and operational level within the framework for financial control determined by the Trustees;
- The maintenance of effective systems of internal control;
- Ensuring that the annual accounts are properly presented and adequately supported by the underlying books and records of the MAT;
- The preparation of monthly management accounts and reporting to the FRA Committee who have delegated powers from the trustees;
- Authorising orders in conjunction with budget holders.
- Authorising electronic payments in conjunction with the CEO or other authorised signatory;
- Ensuring forms and returns are sent to the DFE in line with the timetable in the DFE guidance and seeking required approvals.

Head of Service Finance

2.7 The Head of Service - Finance is designated as the HoSF and, in conjunction with the DCEO-C, has responsibility for the day to day management of Trust central financial operations as determined by these regulations with their main responsibilities being:

- To ensure the MAT's financial processes and policies are followed
- Preparation of monthly school budget monitoring reports
- Authorising electronic payments in conjunction with the DCEO-C or other authorised signatory;
- Assisting with the preparation of the draft annual budget
- Main liaison for internal and external audits

Internal Audit

2.8 The FRA committee also acts as the audit committee and reviews the risks to internal control at the MAT and have agreed a programme of work that will address these risks, to inform the governance statement that accompanies the trust's annual accounts and, so far as is possible, provide assurance to the external auditors.

The Trustees have agreed to buy in the services of an internal audit service to ensure that financial transactions have been properly processed and that controls are operating as laid down by the Trustees. A report of the findings from each visit will be presented to the FRA Committee.

Other Staff

2.9 Other members of staff, primarily the Headteachers, the Finance officers and budget holders, will have some financial responsibility as determined and amended from time to time with the Scheme of Delegation. All staff are responsible for the security of MAT property, for avoiding loss or damage, for ensuring economy and efficiency in the use of resources and for conformity with the requirements of the MATs financial procedures.

Register of Interests

2.10 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 MAT Members, Trustees, members of Academy Committees and staff are required to declare any financial interests they have in companies or individuals from which the MAT may purchase goods or services. This is a register of Pecuniary Interests, held by the Trust on behalf of the MAT across all schools and is open to public inspection.

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

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

3. Accounting System

3.1 All the financial transactions of the MAT must be recorded on the MAT accounting system IRIS PS Financials (PSF). The MAT system is operated by the Finance Department and consists of:

- Journals
- Nominal Ledger
- Bank
- Transactions
- Purchase Ledger
- Sales Ledger

System Access

3.2 Access to the PSF system is password restricted and the DCEO-C is responsible for implementing a system which ensures that passwords are changed regularly.

3.3 Access to the component parts of PSF can also be restricted and the DCEO-C is responsible for setting access levels for all members of staff using the system.

Back-up Procedures

3.4 As PSF is a cloud-based system, backups are not required locally, but form part of the cloud services agreement.

3.5 The DCEO-C should also prepare a disaster recovery plan in the event of loss of accounting facilities or financial data. This should link in with the annual assessment made by Trustees of the major risks to which the MAT is exposed and the systems that have been put in place to mitigate those risks.

Transaction Processing

3.6 All transactions input to the accounting system must be authorised in accordance with the procedures specified in this policy. The detailed procedures for the operation of the payroll, the purchase ledger and the sales ledger are included in the following sections of the manual. All journal entries will be reviewed at a high level, the DCEO-C will select a random sample of journals for more detailed review and checking on a monthly basis.

3.7 Detailed information on the operation of PSF can be accessed online on the IRIS Financials Help Portal.

Transaction Reports

3.8 The DCEO-C will obtain and review system reports to ensure that only approved transactions are posted to the accounting system. The reports obtained and reviewed will include:

- Master file amendment reports for the payroll, purchase ledger and sales ledger;
- Management accounts summarising expenditure and income against budget at budget holder level.

Reconciliations

3.9 The Finance team are responsible for ensuring the following reconciliations are performed each month, and that any reconciling or balancing amounts are cleared:

- Sales ledger control account
- Purchase ledger control account
- Payroll control account
- All suspense accounts
- Fixed asset and capital balances
- Other asset liability control accounts
- Bank balance per the nominal ledger to the bank statement

3.10 Any unusual or long outstanding reconciling items must be brought to the attention of the DCEO-C. The DCEO-C will review and sign all reconciliations as evidence of their review.

4. Financial Planning

4.1 The MAT prepares both medium term (three year) and short-term (one year) financial plans.

4.2 The medium-term financial plan is prepared as part of the business planning process. The Trust plan indicates how the MAT's educational and other objectives are going to be achieved within the expected level of resources over the next three years.

4.3 The Trust plan is costed. The budget is a detailed statement of the expected resources available to the MAT and the planned use of those resources for the following year.

Trust plan

4.4 The Trust plan is concerned with the future aims and objectives of the MAT and how they are to be achieved; that includes matching the MAT's objectives and targets to the resources expected to be available. Plans should be kept relatively simple and flexible. They are the "big picture" within which more detailed plans may be integrated.

4.5 The form and content of the Trust plan are matters for the MAT to decide but due regard should be given to the matters included within the guidance to Academies and any annual guidance issued by the DFE.

4.6 Each year the CEO will review the plan and discuss with the Board based on the following:

A review of past activities, aims and objectives - "did we get it right?"

- Definition or redefinition of aims and objectives – "are the aims still relevant?"
- Development of the plan and associated budgets – "how do we go forward?"
- Implementation, monitoring and review of the plan – "who needs to do what by when to make the plan work and keep it on course" and
- Feedback into the next planning cycle – "what worked successfully and how can we improve?"

4.7 The timetable will specify the deadlines for the completion of each of the key stages described above. Lead responsibility for the completion of each of the stages will be assigned by the CEO.

4.8 The completed Trust plan will include detailed objectives for the coming academic year and outline objectives for the following two years. The plan should also include the estimated resource costs, both capital and revenue, associated with each objective and success criteria against which achievement can be measured.

4.9 For each objective the lead responsibility for ensuring progress is made towards the objective will be assigned to an appropriate team member. The responsible manager should monitor performance against the defined success criteria throughout the year and report to the CEO on a quarterly basis. It will be reported to the Trustees if there is a significant divergence from the agreed plan and will recommend an appropriate course of action.

Annual Budget

4.10 The DCEO-C is responsible for preparing and obtaining approval for the annual budget. The budget must be approved by the CEO, the FRA Committee and the Trustees.

4.11 The Budget Forecast Return (BFR) must ~~also~~ be submitted to the DFE by a prescribed date and the DCEO-C is responsible for establishing a timetable for this.

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

4.13 The budgetary planning process will incorporate the following elements:

- GAG funding statements and estimates of other DFE grants based on the previous year's census numbers
- Review of other income sources available to the MAT to assess likely level of receipts
- Review of past performance against budgets to promote an understanding of the MAT cost base
- Identification of potential efficiency savings
- Review of the main expenditure headings in light of the business plan objectives and the expected variations in cost e.g. pay increases, inflation and other anticipated changes
- The inclusion of any ringfenced balances brought forward from previous years

Balancing the Budget

4.14 Comparison of estimated income and expenditure will identify any potential surplus or shortfall in funding. If shortfalls are identified, opportunities to increase income should be explored and expenditure headings will need to be reviewed for areas where cuts can be made. This may entail prioritising tasks and deferring projects until more funding is available.

Plans and budgets will need to be revised until income and expenditure are in balance. If a potential surplus is identified, this may go into reserves or alternatively allocated to areas of need.

Finalising the Budget

4.15 Once the different options and scenarios have been considered, a draft consolidated budget should be prepared by the DCEO-C for approval by the CEO, the FRA Committee and the Trustees. The budget should be communicated to all staff with responsibility for budget headings so that everyone is aware of the overall budgetary constraints and their respective responsibilities.

4.16 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.

Monitoring and Review

4.17 Monthly reports will be prepared by the HoSF. The reports will detail actual income and expenditure against budget and forecast for the full year, both for schools and at a summary level. The DCEO-C will prepare monthly management accounts for the Trust.

4.18 Any forecast overspend against the budget (overall) will in the first instance be discussed with the DCEO-C/CEO.

4.19 The monitoring process should be effective and timely in highlighting variances in the budget so that differences can be investigated and action taken where appropriate. If a budget overspend is forecast it is not appropriate to vire money from another budget; it will simply be recorded as an overspend. All schools are targeted to ensure that their bottom line budgets are balanced.

5. Payroll

5.1 The main elements of the payroll system are:

- Staff appointment;
- Staff contract changes;
- Starters and leavers;
- Payroll administration and
- Bank payments, including staff pay, National Insurance, Pensions and Taxation.

Staff Appointments

5.2 The Trustees have approved a personnel establishment for the MAT in line with the Scheme of Delegated Authority. Changes can only be made to this establishment with the express approval in the first instance of the FRA

Committee who must also ensure that adequate budgetary provision exists for any establishment changes.

5.3 The CEO has authority to appoint staff within the authorised establishment in line with the Scheme of Delegated Authority. The CEO will appoint Headteacher's and Trust senior staff. The CEO (delegated to Head of Service – HR (HoSHR) and Heads) maintains personnel files for all members of staff which include contracts of employment. All personnel changes must be notified, in writing, to the HoSHR immediately. The HoSHR) will share this with the HoSF/DCEO-C.

Payroll Administration

5.4 The MAT payroll is administered by School's Choice Payroll, and payroll transactions are entered/imported to PSF by the Finance Team. Access to the system is password controlled. Password control procedures and backup arrangements are described in section three of this manual.

5.5 All staff are paid monthly through School's Choice Payroll who supply the Trust with reports confirming details for each employee including:

:

- Salary
- Bank account details
- Taxation status
- Pensions
- Personal details
- Any deductions or allowances payable

5.6 These reports are reviewed monthly by the Trusts HR team as part of the pre-payroll reconciliation and approval process. Any corrections/changes are notified to Schools Choice Payroll within the prescribed deadline and notified to the DCEO-C.

5.7 Each school must complete a monthly staff return which provides details for all staff sickness and other absences during the month. All new appointments or terminations and contact changes are managed by the Trust HR Team.

5.8 All data must be input into the payroll system in accordance with the timetable set by Schools Choice Payroll. The HoSHR is responsible for review and approval of these changes.

Payments

5.9 After the payroll has been processed but before payments to staff are made pre-payroll reports are provided to the Trust for review. The Trust HR Team keeps a record of the pre-payroll review to include narrative to support any variances against the previous month's gross salary payments confirming adjustments made for new appointments, resignations, pay increases etc. This reconciliation is reviewed and signed by the DCEO-C before payment is released.

5.10 All salary payments are made by BACS on the last working day of the month

5.11 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, as well as other smaller deductions for items such as child care vouchers, child support agency payments etc.

5.12 After the payroll has been processed the nominal ledger is updated by the Finance team. Postings will be made to both the payroll control accounts and to individual salary cost codes. The Finance team review the payroll control account each month to ensure they balance.

5.13 On an annual basis the DCEO-C and the HoSHR must check for a sample group of staff that the gross pay per the payroll system agrees to the contract of employment held on the personnel file in the school or HR office.

6. Procurement

6.1 The MAT is committed to achieving the best value when purchasing goods and services. To enable this, goods and services should be acquired by competition and all purchasing should be based on good practice and in accordance with the following objectives;

- to supply Penrose Learning Trust with the right goods and services, at the right time, at the most advantageous cost.
- to promote the delivery of value for money through good procurement practice, utilising the most cost efficient and effective methods.
- to facilitate the development of an effective and coordinated purchasing effort within Penrose Learning Trust.
- to identify opportunities for working with others, in order to widen the scope for maximising purchasing power and identifying innovation.
- to develop lasting relationships with contractors and suppliers, whilst ensuring value for money and continuing high performance can be demonstrated.
- to give due consideration to good governance, and to ensure transparency of arrangements.
- to give consideration to sustainable, ethical, social and environmental policies.
- to comply with all relevant UK and EU legislation.
- to develop appropriate management information in order to measure the performance and value for money in purchasing.

Purchase of alcohol

6.2 In accordance with the Academy Trust Handbook, the trust's funds must not be used to purchase alcohol for consumption, except where it is to be used in religious services.

Routine Purchasing

6.3 In order to select the most appropriate procurement process, the total value of the contract should be calculated. This should include initial purchase and implementation costs, and ongoing maintenance and support costs throughout the life of the contract.

6.4 Routine purchases with a whole-life cost up to the tender limit (see section 6.21) can be requested by designated staff and approved in accordance with the Finance Authority Schedule.

6.5 For orders of a value higher than the three-quote threshold, but below the tender limit (see section 6.2.1), multiple quotes (normally at least three) must be obtained and a justification must be provided where the lowest priced quote is not selected. Exceptions to this rule may apply if there are fewer than three companies capable of providing the required goods or services.

6.6 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. A report detailing actual expenditure against budget will be supplied to each budget holder on a monthly basis and will include commitments for orders placed, but not yet invoiced.

6.7 A purchase order must be raised for all goods and services prior to ordering and approved in accordance with the Finance Authority Schedule.

6.8 In the first instance a supplier should be chosen from the list of approved suppliers held on PSF in consultation with finance staff as required. A quote or price must always be obtained before any order is raised. If the budget holder considers that better value for money can be obtained by ordering from a supplier not on PSF, a justification must be made using a new supplier form. No goods or services are to be placed with any new suppliers until these have been confirmed by the Finance Office.

6.9 Orders must bear the signature of the budget holder and countersigned if above their signing authority. The order must be forwarded to the Finance Team where it will be checked to ensure adequate budgetary provision exists before authorising the order.

6.10 Orders are processed either by school-based finance teams or at the Central Trust Office.

6.11 The budget holder must make appropriate arrangements for the delivery of goods to the school/MAT. On receipt the budget holder must undertake a detailed check of the goods received against the delivery note and make a record of any discrepancies. These should be discussed with the supplier of the goods without delay. Budget holders must undertake these checks without undue delay and in any case within 7 days of invoice receipt. The delivery note should be passed to the Finance Team.

6.12 If any goods are rejected or returned to the supplier because they are not as ordered or are of sub-standard quality, the School or Trust Finance Office should be notified. The budget holder is responsible for arranging the return of goods which the finance will record to enable the tracking of any credit notes due.

6.13 All invoices should be sent to the School Finance Team who will arrange authorisation for payment in accordance with the Finance Authority

Schedule. Invoice receipt will be recorded by the school Finance team in the purchase ledger. All invoices will be stamped to record the following:

- Goods/ services received
- Authorisation of payment
- Date of authorisation
- Purchase ledger coding
- Transaction number

6.14 The invoice can be approved by budget holders by either signing the invoice or emailing their approval. Scanned copies of invoices with a signature are also acceptable. By authorising the invoice they are giving their approval they have received the goods / services and that the invoice can be processed for payment.

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6.15 For any invoices for payment to individuals (i.e. payments made outside of the payroll system), consideration must be given to self-employment status using the HMRC guidance on https://www.gov.uk/guidance/employment-status-indicator before processing any payment as a self-employed individual. A record is kept of all checks made.

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

6.17 The Finance team will input details of payments to be made to the purchase ledger on PSF and generate the BACS required. The BACS payments and associated paperwork must be authorised by a minimum of two approved signatories on the online banking system.

6.18 Payments will be made to suppliers by BACS by the central Finance team in line with terms on the invoice and/or contract.

6.19 Goods received and or works completed over the value of £5,000 may be capitalised and added to the respective Asset Register if they meet the relevant fixed asset capitalisation criteria.

Purchasing Cards

6.20 Details of the purchasing cards process and when to use them are included in Appendix D – Purchasing Card Policy

Purchasing Thresholds

6.21 The Purchasing Thresholds relate to the total contract value of the requirement, not just the annual value of the goods or services. It is not acceptable under any circumstances for purchases or contracts to be split into a number of lower value orders to avoid a quotation or tender threshold. If it is a one-off purchase, then the value is the best estimate of the goods or services. Where the value of goods or services increases beyond the original Purchase Order value and the cumulative total exceeds the applicable procurement threshold, approval must be obtained from the CEO or DCEO-C. Any such approval will be reported to the Board for transparency and governance purposes

There are two types of purchasing thresholds, one that refers to Estates (Thresholds table 2) related expenditure and one for all other expenditure (Thresholds table 1). Both should be read in conjunction with Appendix A 'Finance Authority Schedule'.

Thresholds Table 1 - (excluding Estates related expenditure)

Process	Value	Approval	Supporting documents
Order / spend approval	up to £2,000	Budgetholder	Based on the principles of 'Best Value.
Order / spend approval	£2,001 - £5,000	Headteacher Head of Service	One written quotation and one price comparison. Evidence of both to be attached to an approved order.
Order / spend approval	£5,001 - £20,000	Headteacher to £10,000 Head of Service to £20,000	2 written quotations. Evidence of both to be attached to an approved order
Order / spend approval	£20,001 - £100,000	DCEO-C to £50,000 CEO to £100,000	3 written comparable quotations Evidence to be attached to an approved order
Formal tender process	£100,001 - £173,100 (£207,720) incl. VAT)	Trustees	Formal tender process
FTS Tendering procedure	over £173,100 (£207,720) incl. VAT)- supplies / services	Trustees	Formal FTS tender process

Thresholds Table 2 - Estates related expenditure only (for goods and services not defined as works)

Process	Value	Approval	Supporting documents
Order / spend approval	up to £2,000	Budgetholder	Based on the principles of 'Best Value.
Order / spend approval	£2,001 - £25,000	Headteacher to £10,000 Head of Service to £20,000 DCEO-C to £25,000	One written quotation and one price comparison. Evidence of both to be attached to an approved order.
Order / spend approval	£25,001 - £50,000	DCEO-C	2 written quotations. Evidence of both to be attached to an approved order
Order / spend approval	£50,001 to £100,000	CEO Trustees over £100,000 (if not in approved Estates annual plan)	3 written comparable quotations Evidence to be attached to an approved order
Formal tender process	£100,001 - £173,100 (£207,720 incl. VAT)	CEO Trustees (if not in approved Estates annual plan)	Formal tender process
FTS Tendering procedure	over £173,100 (£207,720 incl. VAT)- supplies / services only	Trustees	Formal FTS tender process

Best Value – achieving the best possible educational and wider societal outcomes through the economic, efficient and effective use of resources, the avoidance of waste and extravagance, and prudent and economical administration.

Price Comparison - a costing, prepared using a supplier catalogue or website, can be a desktop quotation; must be recorded.

Written quotation - a detailed costing, provided by letter or email, in response to a specification provided

Exceptions to Procurement Thresholds

Supply/Service Description	Reason for Exemption
Alternative Provision Placements	Placement is based on the individual needs of the student
Catering Supplies (Schools with in-house catering)	Purchases as part of the provision of catering based on best value and availability and quality of supplies
Educational Visits	Where there is no alternative provider of a similar educational visit
Exam Fees	As determined by the school's choice of Exam Board
Software Licences & Subscriptions	Annual renewal as part of a multi year agreement. Renewal outside of a multi year agreement subject to review as part of the annual budget cycle to ensure it continues to meet the needs of the school and that no alternative supplier is available
Specialist Service / Supplier	Where the service or supply is unique or so specialist that it is not possible to obtain comparable quotes
Emergency / Remedial works	Estates emergency works and costs of remedial works following PPM contract servicing

Purchasing Routes

6.22 Written details of quotations obtained should be prepared and retained by budget holders for audit purposes (see Thresholds tables 1 and 2 above).

Please also refer to Appendix A 'Finance Authority Schedule'.

6.23 All goods/services ordered with a contract value over £50,000, or for a series of contracts which in total exceed £50,000 must be subject to formal tendering procedures (further guidance below).

6.24 Purchases over (currently) £173,100 for goods and services, and £4,327,500 (for works) (correct as at January 2026), will be subject to UK procurement rules and require notice to be submitted on the Find a Tender Service (FTS). The DCEO-C should be contacted for all FTS tenders.

*works as defined by the public contracts regulations 2015 Link to definition

Use of Purchasing Consortia and Frameworks

6.25 Where possible, a framework agreement should be used for purchases with a total contract value in excess of the tender limit specified in the Finance Authority Schedule and Scheme of Delegation.

6.26 A framework agreement is an arrangement that a 'contracting authority' (e.g. a local authority or a public sector buying organisation) makes with suppliers of goods, works or services, and sets the terms under which a purchase can be made.

6.27 Each framework will have guidelines that you must follow to select a supplier and place an order, and it will require the Trust to either:

- make a direct selection, i.e. choose the best-value option for the requirements from a list of suppliers
- run a mini-competition, i.e. ask all suppliers on the framework to send a bid (or 'tender') for the requirements

6.28 Use of such organisations has the following benefits:

- **Price** – economies of scale provided by the consortium should result in competitive prices from suppliers
- **Speed -** by using an established framework, suppliers are familiar with tender documents and specs and are able to respond and submit their tender responses in reduced time.
- **Reduced administration -** The consortium will normally offer downloadable tender documents for things like specification, scoring, contracts etc. which provide an excellent starting point for further tailoring, significantly reducing the work of defining and initiating the tender process.
- **Proven suppliers -** all suppliers that are party to a given framework have already been assessed and scored on previous tender exercises and meet a minimum scoring threshold
- **Tendering compliance -** many consortia can administer the tender in a compliant manner, providing assurance to the Trust Board that they are meeting their legal obligations in this regard where contracts exceed the UK threshold.

Quotations and Formal Tenders

6.29 When preparing a quotation request or tender, full consideration should be given to:

- Objective of project

- Overall requirements
- technical skills required
- After sales service requirements
- Form of contract.

Invitation to Quote/Tender

6.30 An invitation to tender should include the following:
- Introduction/background to the project;
- Scope and objectives of the project;
- Technical requirements;
- Implementation of the project;
- Terms and conditions of tender and
- Form of response.

Aspects to Consider

Financial
- Like should be compared with like and if a lower price means a reduced service or lower quality this must be considered when reaching a decision.
- Care should be taken to ensure that the tender price is the total price and that there are no hidden or extra costs.
- Is there scope for negotiation?
- Financial stability of the contractor should also be investigated.

Technical/Suitability
- Qualifications of the contractor
- Relevant experience of the contractor
- Descriptions of technical and service facilities
- Certificates of quality/conformity with standards
- Quality control procedures
- Details of previous sales and references from past customers.

Other Considerations
- Pre-sales demonstrations
- After sales service
- Financial status of supplier. Suppliers in financial difficulty may have problems completing contracts and in the provision of after sales service. It may be appropriate to have an accountant or similarly qualified person examine audited accounts etc.

Tender Acceptance Procedures

6.31 The invitation to tender should state the date and time by which the completed tender document should be received by the DCEO-C. Tenders should be submitted in plain envelopes clearly marked to indicate they contain tender documents. The envelopes should be time and date stamped on receipt and stored in a secure place prior to tender opening. Tenders received after the submission deadline should not normally be accepted. Alternatively, tenders may be accepted electronically through the use of a secure portal.

Tender Opening Procedures

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

- For contracts up to £75,000 - two of the budget holder, the DCEO-C or the CEO;
- For contracts over £75,000 – either the DCEO-C or the CEO plus a member of the FRA Committee.

6.33 A separate record should be established to record the names of the companies submitting tenders and the amount tendered. This record must be signed by both people present at the tender opening.

Tendering Procedures

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

6.35 Those involved in making a decision must ensure that they do not accept gifts or hospitality from potential suppliers that could compromise or be seen to compromise their independence.

6.36 Full records should be kept of all criteria used for evaluation for the FRA Committee highlighting the relevant issues and recommending a decision.

6.37 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.

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

FTS Tender

6.39 Penrose Learning Trust acts as one legal entity which means it is subject to UK Procurement Legislation when purchasing goods, services and works. As such we are required to aggregate spend in categories, such as stationery, grounds maintenance, repairs etc and if they exceed the current thresholds then we are legally obliged to formally tender our requirements using the FTS process or find a suitable complaint route to market such as a framework agreement.

Use of External Consultants

6.40 The Trust may on occasion use external consultants to carry out the competitive tendering process, such as for large capital projects or for major service contracts. It is important to ensure that value for money is still being obtained.

Exemptions to Procurement Regulations and Waiver Process

6.41 The MAT may grant an exemption (waiver) to these Procurement Regulations in the following certain circumstances:

- In the case of emergency where there is imminent risk of danger to life, health or serious damage to property, where there is no time to undertake the quotation or tender process because goods, works or services are required immediately to mitigate these risks;
- If, for technical reasons, the goods, works or services can be purchased from only one contractor and this can be justified;
- Where the supply is an addition to an existing contract, as long as the cost of the addition does not exceed more than 50% of the original total contract value and where the addition does not take the total contract value to over £150,000

6.42 Exemptions to these regulations will <u>not</u> be granted without a valid reason. Members of staff should note that a lack of time caused by poor forward planning is <u>not</u> considered a valid reason to apply for an exemption to these Procurement Regulations. Requests for exemptions on this basis will not be authorised.

6.43 Requests for exemptions must be made in writing using the Waiver Form Once completed the Waiver Form should be signed by the relevant manager and forwarded to Finance for recording. The DCEO-C must then authorise all requests to waiver these procurement Regulations.

6.44 Members of staff should not place orders with contractors before the authorisation to waiver these Procurement Regulations has been received.

Employee Travel & Expense Reimbursements

6.45 Where possible all purchases should be paid directly by Penrose Learning Trust in line with the procedures outlined under Section 6.3, however from time to time it will be necessary for members of staff to incur costs on behalf of Penrose Learning Trust. Such expenses will be fully reimbursed as long as they meet the following criteria:

- The expense should be appropriately approved prior to being incurred;
- A current MAT expense claim form must be used to claim back any expenses;
- A copy of the receipt should be submitted with the claim;
- Any expenses must be claimed within 3 months of occurrence;
- All expenses forms must be signed and dated by the claimant as well as the approver.

Please note that claims for the purchase of alcohol will not be reimbursed.

6.46 Penrose Learning Trust operates over a number of sites and as such some members of staff are regularly required to travel between sites/schools. Penrose Learning Trust is happy to reimburse staff for their travel costs subject to the following:

- The journey taken is for business purposes only.
- the mileage claimed is for the full length of the journey less the normal home to place of work mileage (e.g., if I am travelling to a school in Ipswich from home and the journey is 45 miles, but my normal home work journey is 20miles, the claim should be for 25 miles only).
- Home to work travel may only be claimed if a member of staff has to return to their main place of work after the normal working hours, for example, for a parents' evening or other school/Trust event.
- Staff are expected to make use of public transport where it is available, unless its use results in considerable inconvenience, expense or if it is not a viable option due to non-availability of public transport, a disability or the need to take equipment or passengers.
- All staff are encouraged to undertake car-sharing where possible and when travelling to the same venue.
- Rail fares: the actual cost incurred for standard return second class tickets will be reimbursed. Staff should seek the lowest fare available for the journey and the time of day. Wherever feasible, advance booking should be used to secure the cheapest fare. However, line/business managers should not unreasonably withhold full reimbursement when it has not been possible to book in advance. It is only normally possible to pre-book longer rail journeys. Used tickets or a receipt should be retained.
- Bus and underground fares. Expenses can be claimed as incurred. A copy of the bus tickets or receipts should be kept as a record of the cost.
- Taxi fares. As incurred for short journeys only if there is no other viable means of transport. Where a journey might require a taxi from

home to a station, or from station to destination, line managers should consider whether it would be cheaper and/or more practicable for the staff colleague to use a car.

- Where travel by public transport is impractical, the rate of reimbursement for car mileage will be paid at HMRC approved mileage rates as per the table below. As this rate of reimbursement is at the level determined by HMRC, no tax liability exists in respect of the sum reimbursed.

Type of Vehicle	**First 10,000 business miles in tax year**	**Each business mile over 10,000 miles in tax year**
Cars & Vans	55p per mile	25p per mile
Motorcycles	24p per mile	24p per mile
Bicycles	20p per mile	20p per mile

- Where staff carry another employee in their own car or van on a business journey, an additional amount of 5p per mile can be claimed.
- Reasonable car parking expenses will be reimbursed on production of a receipt

6.47 Members of staff using their vehicle in the course of their employment must ensure that their car insurance policy covers business journeys undertaken on behalf of their employer. Staff submitting and signing the claim form are confirming that this cover is in place at the time of the journey is made. Anyone claiming mileage reimbursement must provide proof of business use insurance on their current policy upon request.

7. Income

7.1 The main sources of income for the MAT are the grants from the DFE and from local authorities. The receipt of these sums is monitored directly by the DCEO-C who is responsible for ensuring that all grants due to the MAT are collected.

7.2 The MAT also obtains income from:

- Parents/carers of Students, mainly for trips and purchase of resources:
- Donations from Parent Associations and local businesses
- The public, mainly for sports lettings.

Trips

7.3 Prior to approval of any trip a lead teacher must be appointed. The lead teacher must present a costing sheet detailing a breakdown of the costs and thus the expected cost per pupil, to include an allowance for those children in receipt of pupil premium. Parents can request to see this at any time.

7.4 Students should make payments electronically via the Arbor, the payment app or at the Finance Office.

7.5 The Finance team should maintain an up to date record for each student showing the amount paid and the amount outstanding. This record should be sent to the lead teacher on a regular basis and outstanding amounts will be chased by school staff.

Custody

7.6 All cash and cheques must be kept locked away securely in the Finance Office prior to banking. Banking should take place every week or more frequently if the sums collected exceed the insurance limit (currently £10,000) on the individual School's Finance Office safe. (regularly fortnightly).

7.7 Monies collected must be banked in their entirety in the Penrose Learning Trust account. The Finance team are responsible for preparing reconciliations between the sums collected, the sums deposited at the bank and the sums posted to the accounting system. The reconciliations must be prepared promptly after each banking and must be reviewed and certified by the HosF.

8. Cash Management

Bank Accounts

8.1 The opening of all accounts must be authorised by the 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. The operation of systems such as Bankers Automated Clearing System (BACS) and other means of electronic transfer of funds must also be subject to the same level of control.

Deposits

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

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

Payment Methods

8.3 The Trust uses BACS/Electronic transfers for payments in all but exceptional circumstances.

8.4 All payment instruments authorising withdrawal from MAT bank accounts must bear the signatures of at least two authorised signatories.

8.5 In the case of payments by cheque, authorised signatories must not sign a cheque relating to goods or services for which they have also authorised the expenditure.

8.6 Direct Debit instructions require two authorised bank signatories. Details of all signed Direct Debit instructions are retained on file for reference.

8.7 These provisions apply to all accounts, public or private, operated by or on behalf of the Trustees of the MAT.

Administration

8.8 The DCEO-C must ensure bank statements are received regularly and that reconciliations are performed at least on a monthly basis. Reconciliation procedures must ensure that:

- All bank accounts are reconciled to the cash book on PSF
- Reconciliations are prepared by the Central Finance Team
- Reconciliations are subject to an independent monthly review carried out by the DCEO-C.
- Adjustments arising are dealt with promptly.

Petty Cash Accounts

8.9 The schools in the MAT maintain a maximum cash balance of £300. The cash is administered by the respective School Finance team and is kept in the School Finance office safe. Petty cash is reconciled to the finance system on a monthly basis.

Petty Cash Deposits

8.10 Deposits to petty cash should be recorded in PSF with the date, amount and a reference, relating to the payment.

Petty Cash Payments and Withdrawals

8.11 In the interests of security, petty cash payments will normally be limited to £20. Exceptional cases may be allowed above £20 e.g. taxi fares. Higher value payments should be made by cheque/BACS directly from the main bank account as a cash book payment. A specific sum may be withdrawn from a trip account for staff to take on the trip either in sterling or the respective national currency. Receipts must be retained for all such expenditure.

Petty Cash Administration

8.12 The School Finance teams are responsible for entering all transactions into the petty cash records on a regular basis. Regular as well as unannounced cash counts should be undertaken by the central Finance Team to ensure that the cash balance reconciles to supporting documentation.

Cash Flow Forecasts

8.13 The DCEO-C is responsible for preparing cash flow forecasts to ensure that the MAT has sufficient funds available to pay for day to day operations.

Investments

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

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

9. Fixed Assets

Asset Register

9.1 All items purchased with a value over the MAT's capitalisation limit and meet the criteria must be entered in an asset register. The asset register should include the following information:

- Asset description
- Asset number
- Serial number
- Date of acquisition
- Asset cost
- Source of funding (% of original cost funded from DFE grant and % funded from other sources)
- Expected useful economic life
- Depreciation
- Current book value
- Location

9.2 The Asset Register helps:

- Ensure that staff take responsibility for the safe custody of assets;
- Enable independent checks on the safe custody of assets, as a deterrent against theft or misuse;
- To manage the effective utilisation of assets and to plan for their replacement;

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

Security of assets

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

9.4 All the items in the register should be permanently and visibly marked as the MAT's property and there should be a regular (at least annual) count by someone other than the person maintaining the register. Discrepancies between the physical count and the amount recorded in the register should be investigated promptly and, where the residual value is in excess of £5,000, reported to the Trustees.

9.5 Inventories of MAT property should be held typically for equipment of a lower value at school level, kept up to date and reviewed regularly.

Fixed Asset Disposals

9.5 Items which are to be disposed of by sale or destruction must be authorised for disposal by the DCEO-C and, where significant, should be sold following competitive tender. The MAT must seek the approval of the DFE in writing if it proposes to dispose of an asset for which a capital grant in excess of £20,000 was paid.

9.6 Disposal of equipment to staff is not encouraged, as it may be more difficult to evidence the MAT obtained value for money in any sale or scrapping of equipment. In addition, there are complications with the disposal of computer equipment, as the MAT would need to ensure licences for software programmes have been legally transferred to a new owner.

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

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

9.9 The fixed asset register is updated with disposals including a record of any sale proceeds and profit/loss on disposal.

Loan of Assets

9.10 Items of MAT property may be loaned to staff and pupils with approval from the Headteacher/CEO. A record of the loan must be recorded and kept under regular review.

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

10. Bad Debts

Wherever possible, income due will be collected before or at the time the relevant sale or service is provided. If this is not possible, a debtor’s account will be issued. However, to ensure sound internal control, staff who raise debtors' accounts should not also have the authority to write off debts.

All debts will be recorded and non-payment will be followed up by issuing reminders at the following intervals:-

- 3 weeks from date of account - 1st reminder
- 6 weeks from date of account - 2nd reminder
- 8-10 weeks from date of account - Final reminder

The final reminder is sent by recorded delivery and advises that legal action will be taken if the account is not settled within 14 days.

After 10 weeks from the date of the account, where the debt is still outstanding, legal action will be considered, and the debtor will be informed of this in writing by the DCEO-C.

If, after every effort has been made to collect the debt and legal action is considered impractical or has been unsuccessful, individual bad (irrecoverable) debts may be written off in accordance with the following procedures:-

a. Any debt up to the value of £25,000 in one single transaction is approved in accordance with the Finance Authority Schedule

b. Any debt up to the value of £45,000 in one single transaction or equivalent of 2.5% of total annual income cumulatively can be approved by the CEO.

1. If a student moves from a Penrose Learning Trust school to another Penrose Learning Trust school and debts remain outstanding against that child or his/her family, the debt will follow the child and transfer to the ledger of the receiving school

2. Where a debt is lodged against an individual student in any one school, the school retains the right to withhold services or provisions to any other family members within the same school. This is most relevant for school trips where places are limited.

3. School meals will not be unreasonably withheld from a student if dinner monies remain outstanding for more than 4 weeks, but the

school retains the right to provide a basic sandwich lunch instead of a hot dinner until the debt is cleared.

c. For amounts over £45,000 or 2.5% of total annual income the DCEO-C on behalf of Penrose Learning Trust must provide 30 days' notice to the Secretary of State for Education of its intention to write off any debts owed to it as set out in Section 83 of Schools Funding Agreement. This notice is required whether or not the circumstances require the Secretary of State for Education's approval (see below).

d. Those debts below the value set out in the Annual Letter of Funding can then be approved and written off by the DCEO-C and/or the CEO and reported to the FRA Committee at the next meeting in accordance with section 2.67 of the Academy Trust Handbook.

e. Any proposed write off of debts *above* the value set out in the Annual Letter of Funding requires the prior written consent of the Secretary of State for Education in accordance with section 82 of Schools Funding Agreement.

Penrose Learning Trust will retain a Bad Debt Write-Off Summary.

11. School Charging and Remissions Policy

A. General

1. The Trustees recognise the valuable contribution that a wide range of activities, including educational visits and residential experiences, can make towards students' personal and social education. Such activities should be seen as an integral part of a broad and balanced curriculum for all students.

2. The Trustees aim to encourage and promote such activities both as part of a broad and balanced curriculum for the students of the School and as additional, optional activities.

B. Charges

1. The Trustees reserve the right to make a charge for the following activities organised by the School:

    i. those organised for students outside of school hours or otherwise deemed to be an optional extra as defined in the Education Act;

    ii. those involving a board and lodgings element and deemed to be within school hours;

iii. individual instrumental tuition which takes place within school hours, unless it forms part of the syllabus of a prescribed public examination or the National Curriculum;

iv. those involving the purchase or hire of instruments, materials, equipment and clothing (or the provision of them by students or parents) in cases where it has discretion so to do.

2. Acts of vandalism and negligence: The Trust reserves the right to recover part, or the whole cost, of damage to buildings or equipment which is the result of vandalism or negligence by a pupil.

3. Where a student has not been prepared for a public examination by the School, the Trustees may make a charge for the cost of entering the student for the examination if previously agreed by the parents.

4. If a student fails without good reason to complete the examination requirements for any public examination for which the Trustees have paid (or is liable to pay) an entry fee then the Trustees may recover the fee from the parents.

5. Where the preparation provided by the School would enable a student to take 2 or more alternative examinations in syllabuses for prescribed public examinations, the Trustees would only be required to enter the student for one examination free of charge: entry fees for additional examinations would have to be paid for by parents.

6. Where the Trustees of the School makes a charge in respect of an activity provided by the School for which provision is included in the School's budget share, the Trustees will take account in its resource allocation formula of the relevant proportion of the income accruing to the School for that activity.

7. Nothing in this policy statement precludes the Trustees from inviting parents to make voluntary contributions towards the cost of providing education for students.

C. Remissions

1. Where the parents of a student are eligible for Pupil Premium, the payment support for any activities or resources is delegated to each school as the income is ring fenced and reported on at school level.

2. Contributions will be determined on a trip by trip basis and agreed in advance.

3. In other circumstances there may be cases of family hardship that make it difficult for students to take part in particular educational activities for which a charge is made. Parents can apply for remission of charges in part or in full. Application should be made to the Headteacher who will consider the request on behalf of the Trustees.

12. Anti-Fraud Policy

Introduction

The MAT requires all Staff and Trustees to act honestly and with integrity at all times and to safeguard the public resources for which they are responsible. The MAT will not accept any level of fraud or corruption; consequently, any case will be thoroughly investigated and dealt with appropriately. The MAT is committed to ensuring that opportunities for fraud and corruption are reduced to the lowest possible level of risk.

What is Fraud?

No precise legal definition of fraud exists; many of the offences referred to as fraud are covered by the Theft Acts of 1968 and 1978. The term is used to describe such acts as deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion. With respect to the MAT this applies to all areas of the MAT's business and activities.

"Fraud" is usually used to describe depriving someone of something by deceit, which might either be straight theft, misuse of funds or other resources, or more complicated crimes like false accounting and the supply of false information. In legal terms, all of these activities are the same crime – theft.

Avenues for Reporting Fraud

The MAT has in place avenues for reporting suspicions of fraud. Trustees and members of staff should report any such suspicions in line with the MAT's Whistle Blowing Policy. All matters will be dealt with in confidence and in strict accordance with the terms of the Public Interest Disclosure Act 1998. This statute protects the legitimate personal interests of staff. The MAT's Whistle Blowing Policy provides further information. Vigorous and prompt investigations will be carried out into all cases of actual or suspected fraud discovered or reported.

Responsibilities

The Academy Trust Handbook is the Department for Education's financial guide for the governing bodies and managers of academies. Drawing on the overall financial requirements specified in MAT Funding Agreements, it provides detailed guidance on a wide range of financial management, funding and accounting issues.

The Academy Trust Handbook sets out the overall governance framework for academies and describes the key systems and controls that should be in place. It describes the grants that the Department makes available and specifies the financial reporting/budget management arrangements that must be followed by academies to ensure accountability over the substantial amount of public funds that they control. It also discusses in detail the requirements for preparing an annual trustees report and accounts in order to comply with Company Law, Accounting Standards and Charity Commission expectations.

The CEO as the Accounting Officer is responsible for establishing and maintaining a sound system of internal control that supports the achievement of the MAT's policies, aims and objectives. The system of internal control is designed to respond to and manage the whole range of risks that the MAT faces.

The system of internal control is based on an on-going process designed to identify the principal risks, to evaluate the nature and extent of those risks and to manage them effectively. Managing fraud risk will be seen in the context of the management of this wider range of risks.

Overall responsibility for managing the risk of fraud has been delegated to the CEO.

The responsibilities of the CEO therefore include:

- Developing a fraud risk profile and undertaking a regular review of the fraud risks associated with each of the key organisational objectives in order to keep the profile current;

- Establishing an effective anti-fraud policy and fraud response plan, commensurate to the level of fraud risk identified in the fraud risk profile;

- Designing an effective control environment to prevent fraud commensurate with the fraud risk profile;

- Establishing appropriate mechanisms for:

    - reporting fraud risk issues;
    - reporting significant incidents of fraud to the Accounting Officer;
    - external reporting in compliance with Company Law, Accounting Standards and Charity Commission expectations.
    - coordinating assurances about the effectiveness of anti-fraud policies to support the Statement of Internal Control;

- Liaising with the FRA Committee on issues of fraud prevention, detection, and management;

- Making sure that all staff are aware of the organisation's anti-fraud policy and know what their responsibilities are in relation to combating fraud;

- Developing skill and experience competency frameworks;
- Ensuring that appropriate anti-fraud training and development opportunities are available to appropriate staff in order to meet the defined competency levels;
- Ensuring that vigorous and prompt investigations are carried out if fraud occurs or is suspected;
- Taking appropriate legal and/or disciplinary action against perpetrators of fraud;
- Taking appropriate disciplinary action against supervisors where supervisory failures have contributed to the commission of fraud;
- Taking appropriate disciplinary action against staff who fail to report fraud;
- Taking appropriate action to recover assets;
- Ensuring that appropriate action is taken to minimise the risk of similar frauds occurring in future.

All managers are responsible for:

- Ensuring that an adequate system of internal control exists within their areas of responsibility and that controls operate effectively;
- Preventing and detecting fraud;
- Assessing the types of risk involved in the operations for which they are responsible;
- Reviewing and testing the control systems for which they are responsible regularly;
- Ensuring that controls are being complied with and their systems continue to operate effectively;
- Ensuring that those employees for which they are responsible have regular training;

- Implementing new controls to reduce the risk of similar fraud occurring where frauds have taken place.

Every member of staff is responsible for:

- Acting with propriety in the use of official resources and the handling and use of public funds whether they are involved with cash or payments systems, receipts or dealing with suppliers or the MAT's decision-making bodies;
    - Conducting themselves in accordance with the seven principles of public life set out in the first report of the Nolan Committee "Standards in Public Life". They are: selflessness, integrity, objectivity, accountability, openness, honesty and leadership;
- Being alert to the possibility that unusual events or transactions could be indicators of fraud;
- Reporting details immediately through the appropriate channel if they suspect that a fraud has been committed or see any suspicious acts or events;
- Cooperating fully with whoever is conducting internal checks or reviews or fraud investigations.

Members of the Trust Board are responsible for:

- Ensuring that an adequate system of internal control exists within their areas of responsibility and that controls operate effectively;
- All members are responsible for abiding by the MAT's policies and regulations and the guidance on Codes of Practice for Board Members of Public Bodies.
- Being alert to the possibility that unusual events or transactions could be indicators of fraud;
- Reporting details immediately through the appropriate channel if they suspect that a fraud has been committed or see any suspicious acts or events;
- Cooperating fully with whoever is conducting internal checks or reviews or fraud investigations

The MAT's Audit Committee:

The MAT has decided to include the Audit Committee function within the Terms of Reference for the FRA Committee.

13. Gift and Hospitality Policy

13.1 General

This is the MAT's approved Code of Conduct relating to the offer and/or acceptance by staff and/or trustees of gifts and hospitality of whatever nature from outside individuals or organisations.

Within the terms of the Code, staff, AC's and Trustees are expected to exercise common sense. If they are in any doubt they must consult the Chair of Trustees and staff and Headteachers to consult the CEO and in every case declare the acceptance of a gift or hospitality in the respective school or central trust gifts and hospitality register.

The process set out is designed to safeguard Trustees and staff from any misunderstanding or criticism.

The general principles which govern gifts and hospitality are: -

a. Offers of hospitality should only be accepted if there is a genuine need to represent the MAT.

b. Gifts should only be accepted in exceptional circumstances.

c. Cash or monetary gifts must never be accepted.

d. The Code of Conduct applies to all Trustees, and staff of the MAT.

e. To determine whether a gift or hospitality is acceptable, the 'PROVEIT' test should be applied by staff and referred to the CEO/Chair of Trustees if in doubt.

f. Registers are accessible for viewing by the following appropriate officers: CEO, Trustees, Reporting Officer, DCEO-C, External Auditors, and Responsible Officer.

g. Any request by a member of the public to view the Register of Declarations of Gifts and Hospitality will be referred to the CEO. In considering any request, they will balance the requirement for the MAT to be open and transparent against the requirements of the Data Protection Act 1998.

13.2 Hospitality

The following principles should be followed in deciding whether or not to accept hospitality: -

1.(a) Staff, AC's and Trustees should ask themselves whether members of the public, knowing the facts of the situation, could reasonably think that they might be influenced by the hospitality offered. If the answer is yes, the hospitality should be declined. In making judgements, relevant facts to consider include the person or organisation offering the hospitality, its scale and nature, and its timing in relation to decisions to be made by the MAT.

(b) Care should be taken to avoid situations in which an individual Trustee or member of staff is the sole person invited to partake of hospitality or where it creates a pattern of receiving hospitality from that organisation.

2. Examples of when it may be proper to accept hospitality (always depending upon the particular circumstances) are as follows:-

   (a) Attendance at conferences, events and demonstrations of equipment organised by outside bodies where there is a service interest.

   (b) Attendance at events or functions where there is a demonstrable need for the MAT to be represented to either give or to receive information or to participate as part of the MAT's corporate image.

   (c) Attendance at events or functions which are part of the civic, cultural or sporting life of the MAT.

   (d) Working lunches where this is an appropriate and effective way of conducting business and the refreshments provided are on a reasonable level.

3. Overnight hospitality linked to any of the above should not be accepted.

13.3 Receipt of Gifts

All personal gifts should be refused or donated to charity unless they come within the categories) below:

1. Gifts of the following type may be accepted:-

   a. modest gifts of a promotional character, e.g. calendars, diaries and other similar articles. See also point 4; and

b. gifts on the conclusion of any courtesy visit to an outside organisation of a sort normally given by that organisation.

c. Gifts up to £50 in value

2. Gifts which are intended for the MAT as a corporate body or intended for a MAT can be accepted but must not be retained by the individual who receives them. Such gifts should be passed to the MAT as appropriate.

3. It is common for appreciative parents and pupils to register their thanks for the work of staff in the form of a small personal gift. If these are valued at less than £50 these are perfectly acceptable. These will not need to be recorded in the register. Where gifts valued over £50 are accepted, these should be recorded in the register.

13.4 Registration of Gifts and Hospitality

Staff must, within 28 days of being offered any gift or hospitality, must record this in the respective school or central trust gifts and hospitality register. School based staff will require the approval of the headteacher and central trust staff will require the approval of the CEO. All offers should be recorded in case of any queries, in particular through Freedom of Information requests.

The register must be completed in full, setting out full details of the offer or the gift and or hospitality received as well as:

- estimated or actual value;
- the person/organisation offering the gift/hospitality
- an indication if the gift has been accepted/refused and any action taken
- the employee's/Trustee's printed full name and signature

13.5 Monitoring

Each school and the central trust office maintain a register of gifts and hospitality.

At the end of each term registers are signed off by the headteacher/CEO and then held centrally by the trust. In the case of no entries, in the register, the headteacher/CEO will still require to sign off to indicate a nil return.

The MAT monitors the Registers and reports the outcome annually to the Full Trustees/FRA Committee. Any concerns/issues identified should be noted and an action plan put in place.

13.6 Penalties for breaching the Code of Conduct

The MAT's disciplinary procedures may be applied where it is found that breaches of the code have occurred.

13.7 Full Trustees - Monitoring of the Code of Conduct
As part of its role in promoting high standards of conduct, the Full Trustees will receive annual reports on the monitoring of the code.

13.8 Retention of Documentation
Documentation in the Register will be kept for seven years.
Managing the Receipt of Gifts and Hospitality

The **PROVEIT** test: Whether or not the offer is acceptable:

Purpose	Token, thanks or seeking favour? (token of thanks: yes; favour: no)
Rules	What are they? Does this situation conform?
Openness	Is the offer transparent?
Value	Expensive or inexpensive?
Ethics	Does the offer fit with MAT ethics? Is this an exceptional circumstance?
Identity	Who has made the offer?
Timing	Are you about to make a decision affecting the giver?

13.9 Giving of Gifts
Subject to prior approval by the Headteacher/Principal/CEO, the school revenue budget can purchase gifts up to the value of £50 for the following:

- Flowers/gift for long term absence/accident/injury for staff
- Flowers/gift for staff suffering a bereavement of a child, partner or parent

School revenue budget cannot be used to purchase flowers/gifts for the following;

- New babies
- Birthdays
- Bereavements beyond close relatives listed above
- Leavers
- Retirements (beyond long service award)

These items should be purchased from staff collections

13.10 Monitoring

The HoSF will monitor the purchase of gifts using the MATs accounting system PSF and this will also form part of the Trust's external audit programme.

14. Lettings Policy

Introduction

Prior to the letting taking place, this document and the MAT's Policy for Health and Safety should be provided to the hirer who must sign to confirm that they have read and accepted these terms and conditions.

Definitions

Hirer	The person or organisation entering into the contract with the MAT
User	Those people making use of the premises hired under a letting agreement between the MAT and the hirer
Steward	person or persons 'supervising' or organising the users

General Conditions

- Lone working procedures need to be in place to cover the person unlocking/locking up and other support activities. Separate guidance on lone working is available if required.

- The hirer is responsible for the health and safety issues, not the MAT. All statutory requirements must be observed and MAT specific requirements complied with.

- Lettings may occur during the hours of darkness. Adequate and sufficient lighting is provided inside and outside the premises to assist with safe access and egress, including around the car park. As the hirer is in control of such lighting, they will be shown where the switches are. Stewards must have torches to assist in the event of an evacuation as there is no internal emergency lighting.

- Details of vehicle and pedestrian entrances and exits, parking facilities, toilets etc. are made known to the users.

- The MAT will accept no responsibility for damage howsoever caused to vehicles and other property while the user is on the MAT site. Parking is made available only on the basis that it is at the vehicle owner's risk. The hirer is asked to arrange for users to park in designated areas only.

- The hirer must ensure that only that part of the building actually hired is used and must observe any instructions given by the site supervisor/ member of MAT staff concerning the area available.

- Hirers are responsible for signing in and for monitoring persons on site, so that in the event of an emergency, all persons can be accounted for.

- Hirers will be acquainted with the emergency and evacuation procedures (which are on display), including the location of the fire alarms, extinguishers and emergency exits and muster points during a premises familiarisation session in advance of the actual hiring. Once completed the hirer takes responsibility for briefing other users associated with the hiring. They must also carry out their own fire drills. Fire appliances must not be removed or tampered with other than for firefighting purposes. The hirer will ensure that the users' activity is not so loud or otherwise obtrusive as to render the fire alarms ineffective. The hirer is responsible for drawing up specific evacuation plans for any disabled people. Procedures are in place in the event of a fire alarm call point being set off accidentally. Fire exits must not be blocked or locked, nor should furniture, equipment, or other obstructions be placed in corridors during the hiring. Hirers may legitimately request to see the MAT's fire risk assessment.

- Rooms that are made available to hirers are checked periodically (not less than once per term) to ensure that they are in a suitable condition for the specific activity that any lettings will involve. Records of such inspections are kept. The MAT is not responsible for the users' activities, but is assured that the activity and the hired room/equipment available are compatible.

- Any precautions required to ensure the users' safety when using equipment are the responsibility of the hirer. Equipment will be provided by the hirer and not by the MAT. All mains powered electrical equipment brought onto the premises must be safe and evidence may be required that it has a valid test and inspection certificate (the certificate should not be less than one year old for earthed equipment, or less than 4 years old for double insulated equipment). Lower voltage equipment must also be safe and in good condition.

- The cost of any maintenance or repair work which is necessary because of the hirer's/user's activities will be borne by the hirer.

- It is the responsibility of the hirer to provide first aid equipment and trained personnel.

- Smoking is not allowed in any part of the MAT premises.

- The hirer shall not allow so many users into the premises as to exceed the seating and/or dancing capacity of the premises. Even if the stated capacity is not exceeded, the hirer will not use the space provided in such a way as to create conditions of overcrowding or to impede safe and effective escape from the premises in an emergency.

- The hirer shall provide a sufficient number of stewards as may be necessary to ensure adequate and efficient supervision of the users during the letting.

- The CEO reserves the right to have a member of MAT staff present throughout the letting and to put a stop to any event that is not properly conducted.

- The hirer is responsible for providing access to a mobile telephone for emergency purposes.

- Hirers must have regard to the national standards of qualification, experience and overall competence of instructors/supervisors/coaches for sporting and other activities.

- The hirer must ensure that risks associated with the activity are properly controlled throughout the hire period and that the premises are returned to the control of the MAT in a clean and satisfactory condition including replacing any furniture that has been moved. Any specialist cleaning or disinfection required as a result of the hirer's/user's activity in the premises will be the sole responsibility of the hirer.

Safeguarding/child protection

- When services or activities are provided by the MAT under the direct supervision or management of their schools, the individual school arrangements for child protection will apply.

- Where services or activities are provided separately by another body, the MAT seeks assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place and ensures that they liaise with the school on these matters where appropriate.

- The MAT also ensures safeguarding requirements are included in the hire agreement, as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

Insurance

- It is the responsibility of the hirer to effect suitable public liability and other relevant insurance cover. As a general rule cover up to £5 million is required.

In the event of an incident, fire or near miss

- The MAT will ensure that Incident Report forms are made available to the hirer who in turn, must ensure one is completed whenever necessary. The MAT will follow up the report to ensure that it is completed correctly and that an investigation is undertaken. A review of the risk assessment for the activity will be required from the hirer.

License

- The hirer is responsible for ensuring that any necessary licenses required for a particular event have been obtained (such as theatre, performing rights or cinematograph licenses).

15. Pecuniary Interests

The Code of Conduct for MAT Board, Members & Staff is in place and signed annually.

Register of Disclosure of Interests - Notes of Guidance

The public is entitled to expect the highest standards of conduct from all employees who work for the MAT. Under the MAT's Code of Conduct, all staff, including temporary employees, are required to disclose to the CEO the interests set out below. This must be done within 28 days of the interest becoming apparent.

15.1 Relationships with Contractors and Suppliers of Goods and Services

(a) **Award of orders and contracts**

Employees who are responsible for the award of orders and contracts should make known, in writing, to the CEO all relationships of a business or private nature that they have with contractors and other suppliers of goods and services. An explanation as to the exact nature of the relationship should be made and whether or not the company or business has in the past or currently supplies goods or services to the MAT or has a contract with the MAT.

(b) **Relationships in a private or domestic capacity**

Employees who, in the course of their job, engage or supervise contractors and suppliers or have any other official relationship with contractors and/or have had, or currently have, a relationship in a private or domestic capacity with contractors (or their senior staff) should make this known to their CEO.

15.2 Personal Interests

Conflict of interests

Employees must declare in writing to their CEO any financial or non-financial interests which could reasonably be considered to conflict with the MAT's interests.

The MAT will ensure:

(a) that employees and Trustees (including temporary employees) are regularly advised of the need to make such declarations,

(b) that employees personally print and signs their name on the declaration,

(c) that employees give their declaration of interest form to the CEO for authorisation,

(d) that the Registers are kept up to date,

(e) that the Board of Trustees is advised annually that the register is up to date and the name of the person responsible for the register and where they can be located.

Ongoing disclosures need to be submitted in every return, even if they have been previously disclosed. The Register is a living document and the previous returns form part of the Register. The returns should be kept for seven years.

The 'keeper' of the register should ensure that they obtain either a nil return, or a pro-forma which provides the details of the individual declarations.

The Register is accessible for viewing by appropriate officers during office hours. Any request by a member of the public to view the Register of Officers' Interests will be referred to the CEO. In considering any request, they will balance the requirement for the MAT to be open and transparent against the requirements of the Data Protection Act 2018 and of Article 8 of the Human Rights Act, and reach a judgement in each specific case.

There is a legal requirement for the MAT to maintain a Register of Business Interests. In declaring any interests, you are protecting yourself from any false accusation of bias or corruption.

In considering whether you have an interest, you should ask yourself whether a member of the public, knowing the facts of the situation, could reasonably think that a relationship or interest you have, might conflict with the interests of the MAT. The list below is not exhaustive and it is also important to note that you may not always need to declare an interest. For example, the answer to one of the questions below may be “yes”, but the relationship or connection does not impinge on the type of work you do, so you may not need to declare an interest. Conversely, there may be other circumstances not listed below where you do need to declare an interest. If in doubt, please speak to your line manager in the first instance.

Think about the following questions:

- Are you related to a county or district councillor?
- Are you a member of a parish, town or community council? Are you related to a member?
- Are you a School/MAT Trustee or related to a School/MAT Trustee?
- Are you a partner, company secretary or non-executive chairman of a company which does business with the MAT?
- Are you employed by a body which carries out work for the MAT, or were you recently so employed, or are you related to someone who is so employed?
- Do you do part-time or occasional work for a company which undertakes work for the MAT or which competes with the MAT for work?
- Are you undertaking any business ventures in your own time that could conflict with the MAT’s interests?
- Are you related to or friends with anyone who tenders for work from the MAT?

16. Redundant Equipment Policy

Introduction

In accordance with section 5.22 of the Academy Trust Handbook, the Trustees are required to establish a policy for the disposal of assets which ensures the best possible value is obtained from the disposal.

Surplus Equipment

The Trustees have the authority to declare equipment, furniture or other assets or stores, surplus to requirements and to make arrangements for their sale or write off, provided that the items concerned were purchased in whole or in part with a grant from the Secretary of State for Education.

A Disposal of Equipment form will be completed for all items which are to be disposed of and internal control will be exercised to ensure that the asset is no longer of use (i.e. it is obsolete) and that obsolete stocks are destroyed to ensure they are not illegitimately procured and then resold.

Where the estimated disposal value of surplus or redundant assets (equipment) is less than £500 or sale is to be by public auction or competitive tendering, disposal can be authorised by the Head Teacher or DCEO-C.

The prior approval of the Trustees will be required if;

1. The estimated disposal value is above £5,000 or;

2. The sale is to be to a Trustee or employee of the MAT.

The prior written consent of the Secretary of State for Education is required in accordance with section 89 of the School Funding Agreement as follows;

1. Before the disposal of any asset for which a grant of over £20,000 was made, or land and buildings which had been transferred from the Local Authority at no cost to the MAT.

2. Before the sale or disposal by other means, or reinvestment of proceeds from the disposal of an asset or group of assets, for which a capital grant in excess of £20,000 was paid.

As set out in section 93 of the School Funding Agreement the MAT will provide 30 days written notice to the Secretary of State for Education of its intention to dispose of assets for a consideration less than the best price that can reasonably be obtained, whether or not such disposal requires the Secretary of State for Education's consent as detailed above.

If within any one year (September – August) the MAT disposes of items which collectively originally attracted a grant of more than £20,000 then the Secretary of State for Education will be informed in accordance with section 2.87 of the Academy Trust Handbook.

In accordance with section 2.88 of the Academy Trust Handbook the MAT will reinvest the proceeds from all asset sales for which a capital grant was received and hence any income from the sale of assets will be maximised. Where the asset disposal requires the consent of the Secretary of State for Education then the plan for the reinvestment of the proceeds will be agreed at the same time. If the sale proceeds cannot be reinvested the MAT will repay to the Secretary of State for Education the same proportion of the proceeds of the sale or disposal as equates with the proportion of the original cost met by the Secretary of State for Education.

The proceeds from the sale of assets acquired with a grant from the Secretary of State for Education will not be used as the MAT's contribution to future grant aided projects or purchases.

The net income (i.e. excluding VAT) from sales of surplus or redundant assets purchased from the MAT budget will be credited back to the MAT budget.

A list of any equipment disposed of will be presented to the Trustees at its next meeting. This list will show, so far as may be known, the item, department, date of manufacture or purchase, values when new and when made redundant (estimated where necessary) and disposal value.
The MAT's inventory will be amended to show disposals and such entries will be endorsed by the Headteacher or DCEO-C.

APPENDIX A - Finance Authority Schedule

This document is an Appendix to the MAT Finance Policies and Procedures document

	Monitoring Arrangements/ Responsibility	Site Managers	Assistant Trust Managers	Heads of Dept (Schools) / Business Manager (CPS)	Heads of Service	Head Teacher	Deputy CEO - Corporate	CEO	Trustees	DfE
Purchase Orders/Invoices (non-Estates)		Up to £500	Up to £1,000	Up to £2,000	Up to £20,000	£2,001-£10,000	Up to £50,000	Up to £100,000	Over £100,000	
Budget Overspend	CEO-C HoS-Finance	No Authority	No Authority	No Authority	No Authority	No Authority	up to £10,000	up to £25,000	Above £25,000	
Devolved Formula Capital (DFC)	Head Teacher HoS-Finance	No Authority	No Authority	No Authority	Up to £10,000	£2,001-£10,000	£10,000-£25,000	£25,001-£50,000	Over £50,000	
Purchase Orders/Invoices (approved estates related projects)	CEO-C HoS-Finance	No Authority	No Authority	No Authority	Up to £20,000	Up to £10,000	Up to £50,000	Above £100,000 following trustee approval	Approval required, but delegated authority given to CEO once annual budget approved by trustees	Annual Return
Budget Overspend (SCA)	CEO-C HoS-Finance	No Authority	No Authority	No Authority	No Authority	No Authority	No Authority	cumulative spend up to annual allocation	Cumulative spend above annual allocation	
Staff Appointments		No Authority	No Authority	No Authority	No Authority	Within their establishment	No Authority	Headteachers & Trust senior staff	Changes to establishment approved by FRA committee	
Hourly pay claims		No Authority	As line manager	As line manager	As line manager	Countersign all for staff in the school	As line manager	As line manager		
Staff Expenses		No Authority	As line manager	As line manager	As line manager	As line manager and if over £500 and/or 3 months	As line manager and if over £500 and/or 3 months	As line manager and if over £500 and/or 3 months	Chair Approves the CEO	
Governor/ Trustee Expenses		No Authority	No Authority	No Authority	No Authority	Approval of AC members	Approval of Chair only	Approval of Chair (in absence of DoS)	Chair approves all governors and other trustees	
Disposal of Redundant Equipment	CEO-C	No Authority	No Authority	No Authority	No Authority	Residual value up to £500	Residual value up to £1,000	Residual value up to £5,000	Residual Value greater than £5,000	Reporting/Consent in accordance with the Academy Trust Handbook
Gifts & Hospitality Register	Gifts Received over £50	No Authority	No Authority	No Authority	No Authority	All school based staff	All central Trust staff	DoS/Chair	CEO	
Bad Debts write off				No Authority	HoS-Finance up to £500	£501-£5,000	£5,001-£10,000	£10,001-£45,000	Reported to trustees in accordance with the academy trust handbook	Reporting/Consent in accordance with the Academy Trust Handbook

APPENDIX A - Finance Authority Schedule *(continued)*

This document is an Appendix to the MAT Finance Policies and Procedures document

	Monitoring Arrangements/ Responsibility	Site Managers	Assistant Trust Managers	Heads of Dept (Schools) / Business Manager (CPS)	Heads of Service	Head Teacher	Deputy CEO - Corporate	CEO	Trustees	DfE
Multi Year Agreements		No Authority	No Authority	No Authority	Up to £20,000 for full term of agreement	No Authority	Up to £50,000 for full term of agreement	Up to £100,000 for full term of agreement and above following trustee approval	Approval required, but delegated authority given to CEO once approved by trustees	
Acquisition & Disposal of Land, Buildings		No Authority	No Authority	No Authority	No Authority	No Authority	No Authority	Delegated Authority following DfE consent and trustee approval	All	Consent Required
Leasehold on Land & Buildings		No Authority	No Authority	No Authority	No Authority	No Authority	No Authority	Delegated Authority following DfE consent and trustee approval	All	Consent Required
Any borrowings (including finance lease)		No Authority	No Authority	No Authority	No Authority	No Authority	No Authority	Delegated Authority following DfE consent and trustee approval	All	Consent Required
Operating leases		No Authority	No Authority	No Authority	No Authority	No Authority	Up to £50,000 for full term of lease	Up to £100,000 for full term of lease and above following trustee approval	Approval required, but delegated authority given to CEO once approved by trustees	
Online Bank Approvals	3 Authorised Approvers									
Bank Reconciliation	HoS-Finance						All	In absence of DoS		
Pre-Payroll release	CEO-C HoS-Finance	No Authority	No Authority	No Authority	No Authority	No Authority	All	In absence of DoS		
Related party transactions	CEO CEO-C	No Authority	No Authority	No Authority	No Authority	No Authority	All under £40,000	All under £40,000	Reported Annually as part of Financial Statements	Reported Annually Consent required over £40,000
Special Payments (e.g. Severance Ex-gratia & Compensation Payments)		No Authority	No Authority	No Authority	No Authority	No Authority	No Authority	Delegated authority following Trustee or ESFA/DfE approval	Non contractual payments under £50,000	Non contractual payments over £50,000

APPENDIX A - Finance Authority Schedule *(continued)*

This document is an Appendix to the MAT Finance Policies and Procedures document

	Monitoring Arrangements/ Responsibility	Site Managers	Assistant Trust Managers	Heads of Dept (Schools) / Business Manager (CPS)	Heads of Service	Head Teacher	Deputy CEO - Corporate	CEO	Trustees	DfE
Reporting Requirements										
Consolidated Management Accounts (incl. Budget Monitoring report, Commentary, cash flow forecast, Balance Sheet)	CEO-C supported by HoS-Finance							Monthly	Trustees - At least termly Chair to receive Monthly	
School Budget monitoring reports	HoS-Finance					Monthly	Monthly	Monthly		
Departmental cost centre budget reports	HoS-Finance			Monthly		Those relevant to role				
Audited Financial Statements	CEO supported by CEO-C & HoS-Finance							Annually	Annually	Annually

Bank Authorised Signatories:	Online Banking Approvers:
Dan Leonard	Dan Leonard
Peter Moore	Peter Moore
Nicola Fairchild	Nicola Fairchild
Di Head	Di Head
	Stuart Youngs
	Mandy Branch

APPENDIX B – Gifts & Hospitality Register

This document is an Appendix to the MAT Finance Policies and Procedures document

Date received	Recipient Name	Recipient Role	Description of Gift/Hospitality	Value of Gift/Hospitality: Minimum £50.00	Donated By	Accepted, Surrendered or Declined	Location of Gift if Accepted	Recipient Signature

APPENDIX C – Payment Card Policy

This document is an Appendix to the MAT Finance Policies and Procedures document

The payment card should only be used when no other method of payment is available. The Trustees and MAT staff will apply the principles of best value, when making decisions about any purchases, including those that require the use of the school payment card.

The card should be held securely in the school safe at all times and should not be removed from school premises without the prior approval of the cardholder.

The card should under no circumstances be used for personal purchases. Misuse of the card may result in withdrawal of the card and disciplinary action being taken, including dismissal.

The cardholder will be given two copies of the school's written policy.
The cardholder must sign and date a copy of the school's written policy. This copy will be kept securely in the Finance Office safe.

All existing financial procedures must be adhered to. Orders must be raised and authorised in the usual way.

All documentation must be kept with regard to the card transaction and reconciled with the monthly payment card bill at the end of each month. The total amount on the purchasing card statement should be input into PSF within 5 days of receipt and supporting paperwork attached.

Lost or Stolen Card

The card holder is responsible for the security of the Lloyds Payment Card and the transactions made with the card. If the card is lost or stolen, these steps should be taken immediately:

Call Lloyds Bank 0800 0964496. The bank will block the use of the card and order a replacement card with a new account number. Notify the DCEO-C.

Cancellation of Card

When an employee is no longer required to hold a card, a cancellation of Employee Undertaking Form must be completed. This should be done in advance and as soon as a cancellation date is known. The form must be signed by both the cardholder and the DCEO-C. It should be returned to the DCEO-C, who will then be able to give advance notification to Lloyds of the date of cancellation.

Damaged Card

If the card becomes damaged, a replacement card can be requested by contacting the DCEO-C. You should follow the procedures as per card cancellation. Once your existing card has been cancelled, the DCEO-C will receive a replacement card and arrange to forward it to you.

Limits

Credit card limits are determined by the DCEO-C and can only be changed with their prior approval.

Reconciling Statements

Reconciliation of the payment card transactions will not be carried out by any of the agreed cardholders. A member of the central Finance team, who is not a cardholder, will be responsible for reconciling the payment card transactions and statements. The DCEO-C will be responsible for keeping all financial documentation relating to the purchasing card. This should be retained for 6 years plus the current financial year.