
Finance Policy

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1.0 Introduction

- 1.1 The purpose of this document is to ensure that the Diocese of Hereford Multi-Academy Trust (Trust) maintains and develops systems of financial control, which conform to the requirements of both propriety and good financial management. It is essential that these systems operate properly to meet the requirements of our funding agreements with the Department for Education (DfE)
- 1.2 Each school within the Trust must comply with the principles of financial control outlined in the academy's guidance, published by the DfE in the Academy Funding Agreement and the Academies Trust Handbook.
- 1.3 The Trust will ensure all staff, including the Accounting Officer, the Chief Finance Officer (CFO), Headteachers, Business Managers and members of the Central Finance Team, who deal with financial matters, are trained in the appropriate financial procedures. The Trust's Finance and Resources Committee, a sub-committee of the Trust Board, will be responsible for reviewing all controls and procedures of financial systems operating within the Trust.
- 1.4 The Trust is a company limited by guarantee, with charitable status, and is governed by a Board of Directors. The membership and main responsibilities of the Board are set out in the written terms of reference. The Directors have opted to establish separate committees, to be known as Local Governing Boards (LAB's) for each school and will ensure that, where possible, each LGB shall include at least one elected representative of the parents of pupils attending the relevant school.

2.0 Purpose of this document

- 2.1 The purpose of these Financial Regulations is to provide control over the Trust's resources, and to provide management with assurances that the resources are being properly applied for the achievement of the Trust's objectives on a sustainable basis including:
 - Financial sustainability
 - Achieving value for money
 - Fulfilling its responsibility for the provision of effective controls over the use of public funds
 - Ensuring that the Trust complies with all relevant legislation; and
 - Safeguarding the assets of the Trust.

3.0 The status of these regulations

3.1 These regulations are applicable to all schools, projects, and Central Office service provision.

3.2 The Finance Regulations are relevant to the Trust and school staff at all levels:

- All staff with duties involving financial management and administration should be made aware of the contents of this policy and have access to it.
- It is the responsibility of each Headteacher to ensure that staff follow the requirements of this policy.

3.3 The Chief Executive Officer (CEO) reserves the right to suspend and/or withdraw delegated authorities, in whole or part, where these regulations are not being adhered to, this would effectively withdraw authority to spend on staffing or other resources.

3.4 Compliance with these Regulations is compulsory for all staff. A member of staff who fails to comply with the Regulations may be subject to disciplinary action, under the Trust's disciplinary policy. Any such breach will be notified to the Board through the Finance and Resources Committee.

3.5 In exceptional circumstances, the Finance and Resources Committee may authorise a departure from the regulations, but such a departure is to be reported to the Board at the earliest opportunity.

4.0 Trust Roles and Responsibilities

4.1 The main responsibilities of the Trust are prescribed in the Funding Agreement with the DfE. The key responsibilities include:

- Ensuring the grants from DfE are used only for the purpose intended.
- Approval of the annual budget in line with DfE guidelines and timelines.
- Balancing its budget from year to year.
- Production of an Annual Report and Accounts.
- Appointment of auditors.
- Appointment of a Chief Executive Officer (as Accounting Officer);
- Appointment of the CFO in conjunction with the Chief Executive Officer (CEO).
- Ensure regularity, propriety, and value-for-money, in relation to the management of public funds.

- Executive pay setting by the Board, must ensure decisions follow a robust evidence-based process.
 - Annual letters to the Accounting Officer from the DfE, regarding the Accountability Framework, are discussed at the Board; and
 - To consider and agree the annual programme of internal scrutiny.
- 4.2 Subject to provisions of the Companies Act, the Articles, and to any directions given by special resolution, the business of the Trust will be managed by the Directors, who may exercise the power of the Trust.
- 4.3 The Trust has defined the responsibilities of key committees and staff involved in the administration of the school finances to avoid duplication or omission of functions, and to provide a framework of accountability for LGB members and staff.
- 4.4 The following sections summarise the responsibilities of those individuals with key roles in the administration and accountability of the Trust finances:

5.0 Trust Board of Directors (The Trust)

- 5.1 The Trust is responsible for ensuring that high standards of corporate governance are maintained, addressing such matters as:
- Finance policy development and strategic planning.
 - Ensuring sound management and administration of the Trust and its schools and ensuring that managers are equipped with relevant skills and guidance.
 - Ensuring compliance with general legislative requirements.
 - Establishing and maintaining a transparent system of prudent and effective internal controls.
 - Management of the Trust's financial, human, and other resources.
 - Monitoring performance and achievement of objectives and ensuring that plans for improvement are acted upon.
 - Setting the Trust's standards of conduct and values.
 - Assessing and managing risk (including the preparation of a statement on school risk management, for its annual report and accounts); and
 - To hold to account the CEO and Trust staff.

6.0 Finance and Resources Committee

- 6.1 The key responsibilities of this committee include:
- Monitor and review the financial position of the organisation and ensure there is proper focus on schools who are struggling with sustainability, or who are non-compliant with this policy.

- Recommend approval of individual budgets to the Board and act as approver for significant transactions, within the Scheme of Delegation.
- Agree the financial strategy of the organisation.
- Monitor capital projects and procurement, pensions and pay; and
- Ensure the financial governance responsibilities of the Board are being met.

6.2 The Committee also has delegated responsibility for risk management and audit which include:

- Monitoring and evaluating the work of internal auditors, external auditors, and the compliance function.
- Keep under review the adequacy of the effectiveness of internal controls.
- Review the overall risk profile of the organisation; and
- Monitor the integrity of the financial statements.

7.0 Chief Executive Officer/Accounting Officer

7.1 The Chief Executive Officer (CEO) has overall responsibility for the Trust's activities, including financial activities. As the Accounting Officer for the Trust, the CEO is personally responsible for:

- Propriety and regularity of public finances, for which they are answerable, this covers standards, conduct, behaviour, and corporate governance;
- The upkeep of proper accounts;
- Prudent and economical administration;
- Avoidance of waste and extravagance;
- Ensuring value for money;
- Efficient and effective use of all available resources; and
- Management of opportunities and risk.

7.2 The essence of the role is a personal responsibility for:

Regularity – dealing with all items of income and expenditure, in accordance with legislation; the terms of the Trust's funding agreement and this policy and compliance with internal Trust procedures; this includes spending public money for the purposes intended by Parliament.

Propriety – The requirement that expenditure and receipts should be dealt with in accordance with Parliament's intentions and the principles of Parliamentary control. This covers standards of conduct, behaviour, and corporate governance.

Value for Money – This is about achieving the best possible education and wider societal outcomes through the economic, efficient, and effective use of all the

resources in the Trust's charge, the avoidance of waste and extravagance and prudent and economical administration. A key objective is to achieve value for money, not only for the Trust, but for taxpayers, more generally.

7.3 In practice, much of the financial responsibility is delegated to the CFO, but the CEO still retains responsibility for:

- Approving new staff appointments, outside of the agreed staffing structure and budgets, except for any senior staff posts, which the Directors have agreed should be approved by them;
- Authorising orders, contracts and releasing payments in conjunction with other authorised signatories, in accordance with the agreed Scheme of Delegation, in excess of delegated CFO thresholds;
- Preparing budget plans in conjunction with the CFO, in line with DfE guidelines, implementing in line with the Trust's budget;
- Seeking the Trust Board's approval for purchase orders or contracts, in excess of delegated thresholds;
- Submitting records to the Trust Board, giving details of income, expenditure, and commitment to date, ensuring any actions resulting from the annual audit are implemented.

8.0 Role of the Chief Finance Officer (CFO)

8.1 The CFO works in close collaboration with the CEO, through whom they are responsible to the members. The main responsibilities of the CFO are:

- Financial issues, including the establishment of operating the Trust's central budget and individual management of the academy financial position at a strategic and operational level within the framework for financial control determined by directors.
- Preparation and consolidation of budget in conjunction with the CEO.
- The maintenance of effective systems of internal controls.
- Maintenance of adequate fixed asset registers.
- The preparation of monthly management accounts, including income and expenditure reports.
- Balance sheet management.
- Ensuring forms and returns are sent to the DfE in line with the timetable in the DfE guidance additional roles, some of which are not directly finance related, as outlined in the CFO's job description; and

- Consideration of novel, contentious or repercussive transactions before they are entered into and reported to the DfE.

9.0 Role of the Central Finance Team

9.1 The duties of the Central Finance Team are to provide support for all schools and the Central Team, in the following areas:

- PS Financials.
- HCSS Budget planning software
- Year-end accounts
- Annual Accounts Return
- VAT and tax returns
- DfE returns, such as Land & Buildings, Asbestos
- Due diligence reports; any other financial responsibility.
- Support to new schools joining the Trust.
- Overall administration and over sight of school budgets.
- Insurance Claims
- Any other statutory/regulatory requirement e.g., Gender Pay Gap, Streamlined energy and carbon report (SECR).
- Liaising with auditors
- Pension returns and audits
- Cash Flow Forecasts
- Providing monthly management reports to schools

10.0 The role of the Local Governing Board (LAB)

10.1 The role of the LGB in school financial administration is:

- To approve the overall budget, including priorities for future expenditure.
- To submit the budget plan to the Trust Board for approval.
- To maintain a register of pecuniary interests for Governors and staff.

11.0 Role of the Headteacher/Executive Headteacher/Head of School

11.1 The day-to-day operation of the budget is delegated to the Headteacher, who will be responsible for:

- Preparing the School Improvement Plan and school budget, in accordance with the priorities agreed by the LGB members and submission of these plans to the LGB for approval.
- Managing internal control systems and internal financial transactions in accordance with the Trust's Financial Policy.

- Maintaining adequate financial records in accordance with Academies Trust Handbook.
- Ensuring procurement limits and authorisations, as identified in the scheme of delegation, are correctly followed.
- Ensuring that information required for returns to DfE and the Trust are submitted according to published deadlines.
- Supplying accounting and other relevant records to Audit, including school fund(s), and implementing auditor recommendations, where necessary:
- Checking that the school inventory is maintained as accurately and up to date as possible and ensuring that an independent check of the inventory is made at least once a year.
- Recommending to Central Finance Team equipment to be written off or disposed of.
- Ensuring that the disposal of any such equipment is adequately recorded.
- Ensuring that stolen items are reported to the Finance and Resources Committee, before formal approval to delete the item from the inventory/asset register is given and reported to the Trust, to report to DfE as per audit requirements.
- Ensuring that adequate procedures are in place for the prompt security marking of all items of a portable and desirable nature.
- Ensuring that adequate controls are in place to ensure that all responsibilities delegated are monitored; and
- To maintain a central file of all submitted applications for grant funding and counter sign all submissions for audit purposes.
- Ensure that Motor Insurance is in place if required by the school.

12.0 The role of the School Business Manager (SBM)/Finance Lead

12.1 Subject to individual job descriptions, the Headteacher may delegate financial procedures to the SBM. For schools without an SBM the Central Finance Team will support school-based administration staff to cover this role. The SBM's roles may include:

- Reviewing the monthly salary reports, signing, and dating these to confirm they are accurate and noting any queries:

- Providing budget monitoring/out-turn monthly reports for the Headteacher to present to the LGB members, and submission as requested, to the CFO/ Finance Manager.
- Ensuring that invoice checking procedures are followed:
- Ensuring that, in conjunction with the Headteacher, authorisation of orders, invoices and schedules are in accordance with this Financial Policy and the Academies Trust Handbook.
- Prompt banking of income and associated recording of income in accordance with the Academies Trust Handbook.
- Administering the recording of income received and payments made from the school fund.
- Retention of all documents, such as collection records and receipts to support the transactions.
- Preparation of the year end summary of transactions for inspection, in accordance with the Academies Trust Handbook.
- Assisting with the maintenance of an accurate inventory and associated security procedures; and
- Assist in the preparation of the three-year budget.

13.0 The role of Staff in schools

13.1 The role of Staff in school financial administration is:

- To familiarise themselves with this policy.
- To conduct all financial transactions relating to the Trust in accordance with this policy.
- To manage any budget delegated to them by the Executive Head/Headteacher, after due consultation with relevant staff.
- To actively see 'best value' on all work, goods, materials, or services procured on behalf of the school.
- To ensure that all relevant documents (delivery notes, invoices, etc.) are promptly passed to the SBM/Finance Lead for processing;

14.0 Delegated Authority/Declaration of Interest

14.1 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 Members, Directors, LGB members and staff, who can influence financial decisions, or spending powers, are required to declare any financial interests

they have in companies or individuals from whom the Trust may purchase goods or services.

- 14.2 The register is open to public inspection and 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 Trust. The disclosures should also include any business interests of relatives, such as parent, spouse, or business partner, where influence could be exerted over a Member, Director, LGB member or a member of staff by that person. It is also important to identify any connected parties or related parties with any other charity, company, or organisation with which it operates in the pursuit of charitable activities.
- 14.3 The existence of a register of business interests does not, of course, detract from the duties of Members, Directors, LGB members and staff to declare interests whenever they are relevant to matters being discussed by the Board, committees, and LGB's. Where an interest has been declared, Members, LGB members, Directors and staff should withdraw from that part of any committee or other meeting.

15.0 Investigation of fraud & irregularity and cyber-crime

- 15.1 The personal responsibilities of the Accounting Officer extend to the prevention of loss through fraud and irregularity. However, in addition to the Accounting Officer's responsibilities, the Members of the Trust are also responsible for preventing such losses of public funds, this means that Members, Directors and LGB members, must be aware of the risk of fraud and irregularity to occur within their organisations and they must, as far as possible, address this risk in their internal control and assurance arrangements, by putting in place proportionate controls. The Trust is also responsible for ensuring appropriate action is taken where fraud and irregularity is suspected or identified.
- 15.2 All instances of fraud or theft committed against the Trust, whether by employees, LGB members or third parties above £5,000 (individually or cumulatively over a financial year) must be reported by the Trust to DfE. Any unusual or systematic fraud, regardless of value, must be reported.
- 15.3 DfE reserves the right to conduct or commission its own investigation into actual, or potential, fraud, theft, or irregularity, in any school, either as a result of a formal notification from the Trust or as a result of other information received.
- 15.4 DfE publishes guidance on fraud, and Trust's should refer to this guidance and to the findings of DfE investigative reports as part of its risk management approach.

15.5 Academy Trusts must also be aware of the risk of cybercrime, put in place proportionate controls and take appropriate action where a cyber security incident has occurred.

15.6 Trusts must obtain permission from DfE to pay any cyber ransom demands. DfE supports the National Crime Agency's recommendation not to encourage, endorse, or condone the payment of ransom demands. Payment of ransoms has no guarantee of restoring access or services and is likely to result in repeat incidents.

16.0 Appointment of External Auditors

16.1 The Trust is required to submit the accounts for annual audit. This means that external auditors need to be appointed. The appointment should be for a reasonable period and should be re-tendered every 5 years.

16.2 The auditors are required to give an opinion on whether:

- The financial statements have been prepared in accordance with Charity Commission's statement of recommended practice (SORP) and the Annual Accounts Directions issued by DfE.
- Proper accounting records have been kept by the Trust throughout the financial year
- Grants made by DfE have been applied for the purposes intended.
- The accounts present a true and fair view of the trust's financial performance and position.
- There is a satisfactory regularity assurance conclusion.

16.3 The Trust should arrange on-going monitoring of the performance of the auditors to be undertaken by the Finance and Resources Committee.

17.0 Accounting Systems

17.1 All the financial transactions of the Trust must be recorded on the PS Financials accounting systems, operated by the SBM/Finance Lead in each school, as well as the Central Finance team.

17.2 Financial records are required to be kept for at least six years; this is a requirement laid down by His Majesty's Revenue and Customs (HMRC)

18.0 System Access

18.1 The PS Financials accounting system is protected by access permissions to authorised staff. Access permissions should be strictly controlled, and individual logins and passwords should not be compromised. Access to PS Financials should be restricted, and the CFO is responsible for determining the access levels for all members of staff using the system.

18.2 All leavers with previous access to PS Financials must have their access permissions formally removed

19.0 Back-up Procedures

19.1 The CFO is responsible for ensuring that there are effective back up procedures for the system. The CFO should also prepare a disaster recovery plan, in the event of loss of accounting facilities or financial data. This should link with the annual assessment made by the Directors of the major risks to which the Trust is exposed and the systems that have been put in place to mitigate those risks.

20.0 Transaction Processing

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

21.0 Reconciliations

21.1 The Central Finance Team, and individual school business managers, where relevant, are responsible for ensuring the following reconciliations are performed each month, and that any reconciling or balancing amounts are cleared:

- Payroll.
- Bank balance per the nominal ledger to bank statement (carried out by Central Finance Team on behalf of the school).
- Credit card.
- VAT.

21.2 Any unusual or long outstanding reconciling items must be brought to the attention of the CFO as evidence of their review if material.

22.0 Annual Budgets

22.1 Annual budgets will reflect the best estimate of the resources available to each school for the forthcoming year, and how those resources are to be utilised by each school. There should be a clear link between the School Improvement Plan objectives and the budgeted utilisation of resources.

22.2 The budgetary planning process will incorporate the following elements:

- Forecast of the likely number of pupils, to estimate the amount of DfE grant receivable.
- Review of other income sources available to the individual school within the Trust, to assess likely level of receipts.
- Review of past individual performance against budgets, to promote an understanding of the Trust's cost base.

- Identification of potential efficiency savings.
- Review of the main expenditure headings in light of the strategic plan objectives and the expected variation in cost, e.g., pay increase, inflation, and other anticipated changes; and
- Liaising with external agencies, including major suppliers, to ensure that the Trust's best financial interests are met.

- 22.3 Individual school plans and budgets will need to be revised until income and expenditure are in balance. Comparison of estimated income and expenditure will identify any potential surplus or shortfall in funding.
- 22.4 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.
- 22.5 If a potential surplus is identified at an individual school within the Trust, this may be held back as a contingency or alternatively will be added to the school's accumulated surplus (or to offset any accumulated deficit) at year-end.
- 22.6 It will be the responsibility of each LGB to recommend an annual budget for submission to the Trust Board. Such recommendation should be clearly minuted, in good time, to allow prompt submission of consolidated plans to the DfE.
- 22.7 The CFO, in conjunction with the Chief Executive Officer, are responsible for preparing and obtaining approval for the Trust's annual budget, which consolidates the budgets of each school in the Trust. The Directors must approve the budget.
- 22.8 The approved consolidated budget must be submitted to DfE by 31st August each year, or at a date specified by DfE.

23.0 Budgeting Software

- 23.1 All the budget information for the Trust must be recorded on the HCSS Budget systems, operated by the SBM in each school, or the Central Finance Team.

24.0 System Access

- 24.1 The HCSS Budget system is protected by access permissions to authorised staff. Access permissions should be strictly controlled, and individual logins and passwords should not be compromised. Access to HCSS should be restricted, and the CFO is responsible for determining the access levels for all members of staff using the system.

25.0 Monitoring and Review

- 25.1 Budget monitoring reports have been developed in which variances are highlighted for discussion as appropriate. The central finance team will produce monthly budget

packs for each school, including budget monitoring reports. The reports will detail actual income and expenditure against budget.

25.2 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. Any potential overspend against budget must, in the first instance, be discussed with the CFO.

25.3 Each school should present monitoring reports to the LGB at least three times a year.

26.0 Cash handling

27.1 The receipt of cash and handling of cash should be avoided. The Trust will enable access to on-line payment systems for all school. Schools should inform all parents & carers that cash cannot be used to pay for goods & services.

27.0 Payroll

27.1 The main elements of the payroll system are:

- Staff appointments.
- Salary Payments

27.2 The payroll is managed by the Central Finance Team, in conjunction with a payroll bureau. SBM's / School Finance Staff are responsible for submitting all relevant forms/paperwork as per HR and Payroll deadlines.

28.0 Staff Appointment

28.1 The LGB's approve a personnel establishment for each school in the Trust, and the Headteacher at each school must ensure that adequate budgetary provision exists for any establishment changes. As set out in the scheme of delegation, permanent and temporary increases to the establishment list must be within agreed budget limits. No unbudgeted changes to the establishment can be made without approval from the CFO.

28.2 Directors of the Trust have the authority to appoint the Chief Executive Officer and the Executive Head/Headteacher, at each school. The appointment of the CFO must be approved by the Directors of the Trust.

28.3 The Chief Executive Officer is responsible for ensuring that the Trust's pay policy is implemented.

28.4 The Chief Executive Officer is responsible for ensuring that the statutory obligations around Safer Recruitment policy and procedures are administered, and Academy Business Managers/Office Managers will be responsible for maintaining accurate records of all staff employed at their school in a Single Central Record.

29.0 Payroll Administration

- 29.1 The Trust payroll is outsourced and administered by SAM People. Amendments to payroll data, e.g., appointments, resignations, pay changes and overtime, should be correctly authorised in line with the scheme of delegation and a record kept in personnel files.
- 29.2 All supply teachers, casual working and overtime claims must be checked and confirmed by a budget holder and must be forwarded promptly to the school Business Manager/ Office Manager.
- 29.3 Any additional payments to staff must be correctly authorised and within agreed budget levels. Where additional hours will lead to an overspend these should be referred to the central team and CFO for authorisation. Permanent increases to staff pay, outside of performance management and contractual incremental progression, must be authorised by the CFO.
- 29.4 Authorisation of additional hours must always be made in line with the scheme of delegation. Staff cannot approve additional hours, expenses claims and any other payments for themselves. Advice should always be sought from the central team.

30.0 Payroll Payments

- 30.1 All staff are paid monthly by bank credit transfer to their bank accounts.
- 30.2 The SAM People payroll system automatically calculates the deductions due from payroll, to comply with legislation. The major deductions are for tax, National Insurance contributions and pensions.
- 30.3 SBM/Finance Lead/Central Finance Team should undertake a monthly reconciliation between the current month's actual expenditure and the budgeted payroll costs.
- 30.4 The Trust has a responsibility for ensuring that all payments to individuals are subject to tax and National Insurance deductions, where appropriate. In order to achieve this, the following guidelines should be followed:
- An assessment must be made as to whether the individual is providing a contract of service (i.e., employed). If considered to be a contract of service, the individual shall be set up as an employee of the school, before receiving payment through the payroll.
 - Where an individual seeks payment from the school for a contract of services, this must be in the form of an invoice.

Careful attention should be paid to repetitive payments to individuals.

31.0 Routine Purchasing

31.1 Budget holders will be informed of the budget available to them as soon as the budget is formally ratified and approved by the Trust's Board. It is the responsibility of the budget holder to manage their element of the budget and to ensure that the funds available are not overspent.

31.2 It is essential that all of the following controls are adhered to:

- Orders should not be entered into verbally.
- The use of official requisition forms through the local system automatically updates the financial records and enables committed expenditure to be included in the monthly management information.
- Orders should only be approved in accordance with the authorised limits within the Scheme of Delegation.
- In exceptional circumstances (e.g., emergency repairs), orders may be placed by telephone; in such circumstances a confirmation order should be generated as soon as possible. Orders may be emailed/scanned to suppliers, in order to reduce timelines.
- Requests for prices for more one piece of work to be complete **must** be on separate quotations.

31.3 **Orders under £3,000** – can be ordered by budget holders, provided it is within their allocated, remaining budget levels. Budget holders will be responsible for ensuring that reasonable steps have been taken to achieve Best Value.

Best Value should be achieved by:

- Supplier chosen from a list of approved suppliers.
- Negotiating discounts.
- Taking advantage of sale seasons; and
- Obtaining alternative quotation, wherever possible.

31.4 **Orders over £3,000** – at least three written quotations should be obtained for all orders greater than £3,000 to identify the best source of the goods/services. Written details of quotations obtained should be prepared and submitted to central finance team for review and subsequently retained by SBM/Finance Lead /Office Manager for audit purposes.

- 31.5 **Orders over £25,000** – must be approved by the CFO and will be subject to tendering to mitigate the risk of a potential breach of European procurement regulations where similar types of expenditure across several academies are aggregated together.
- 31.6 The school budget holder, or the SBM/Finance Lead /Office Manager, must make appropriate arrangement for the delivery of goods and services to the school. On receipt of goods and services, there must be a detailed check of the goods and services received, against the purchase order (or equivalent in exceptional circumstances). All discrepancies should be discussed with the supplier of the goods and services without delay.
- 31.7 All invoices should be sent to the SBM/Finance Lead /Office Manager or the Head Office to be checked against PS Financials numbered order (or equivalent in exceptional circumstances), and the delivery note to evidence the following:
- Invoice arithmetically correct.
 - Goods/services received.
 - Goods/services as ordered; and
 - Prices correct.
- 31.8 Invoices will be authorised for payment by the relevant budget holder and then passed to the SBM/Finance Lead/Office Manager or Head Office, for recording and payment through PS Financials.

32.0 Asset Register

- 32.1 All items purchased with a value over the Diocese of Hereford Multi-Academy Trust (Trust) and school's capitalisation limit of £2,000 must be entered in the school's asset register (See Appendix 1). 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)
 - Location

The asset register helps to:

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

33.0 Security of assets

- 33.1 Stores and equipment must be secured by means of physical and other security devices. Only authorised staff may access the stores.
- 33.2 All the items in the register should be permanently and visibly marked as the Trust and school's property count, and there should be a regular (at least annual) count by a member of staff at the school, other than the person maintaining the register. Discrepancies between the physical count and the amount in the register should be investigated promptly and, where significant, reported to the Directors and LGB members. Inventories of Trust and school property should be kept up to date and reviewed regularly. Where items are used by the Trust and school, but do not belong to it, this should be noted.

34.0 Disposals

- 34.1 Items which are to be disposed of by sale or destruction, must be authorised for disposal by the Finance and Resources Committee and where significant, should be sold following competitive tender. The Trust and school must seek the approval of the DfE, in writing, if it proposes to dispose of buildings, for which, Capital grant in excess of £20,000 was paid.
- 34.2 Disposal of equipment to staff is not encouraged, as it may be more difficult to evidence the Trust and school obtained value for money in any sale or scrapping of equipment. In addition, there are complications with the disposal of computer equipment, as the Trust and school would need to ensure licenses for software programmes have been legally transferred to a new owner.
- 34.3 The school is responsible for ensuring all data on IT equipment is cleansed and removed prior to disposal.
- 34.4 The Trust and the school are expected to reinvest the proceeds from all asset sales, for which Capital grant was paid, in other Trust and school assets. If the sale proceeds are not reinvested, then the Trust and school may have to repay to the DfE a proportion of the sale proceeds. The terms and conditions of the underlying grant should be reviewed and fully considered prior to disposal of a grant funded asset.
- 34.5 All disposals of land must be agreed in advance with the Secretary of State.

35.0 Loan Assets

35.1 Items of Trust and school property must not be removed from the Trust and school premises without the authority of the Executive Head/Headteacher. A record of the loan must be recorded in a loan book and booked back into the Trust and school, when it is returned

35.2 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 'benefit in kind' for taxation purposes. Loans should therefore be kept under review and any potential benefits discussed with the Trust and school's auditors.

35.3 The above is in respect of assets loaned for non-business purposes, not for assets used for purposes of business (i.e. laptops and mobile phones).

36.0 Depreciation

36.1 Depreciation should be calculated against capitalised assets in accordance with the following rates:

- Computer equipment 20% per annum straight line basis
- Fixtures and equipment 20% per annum straight line basis
- Motor vehicles 20% per annum straight line basis
- Church Owned Buildings Over 2 years
- Long term lease hold land Over 125 years
- Leasehold lease hold buildings Over 50 years
- Land is not depreciated

37.0 Credit Cards

37.1 Purpose

The purpose of this document is to provide clear guidance to employees on the issue, and usage, of Company Credit Cards. All individuals must have due regard to the best interest of the Diocese of Hereford Multi-Academy Trust (Trust).

37.2 Card Issue

A Corporate Credit Card may only be issued by the Central Finance Team to individuals where their functions and duties would be enhanced by the use of a Corporate Credit Card. Each Corporate Credit Card will be issued to a specific person, who will remain personally accountable for the use of the card. Cardholders will sign the attached declaration (Appendix 2). Only authorised personnel may use the card. No more than one card shall be issued per cardholder.

37.3 Card Usage

From time to time, the school/Trust Central Office may be offered an opportunity to purchase goods, or arrange for services, for the school/Central Office from companies that will not invoice, but will only accept a direct payment.

The primary method of payment remains invoicing, and this should be generally used in preference to card purchases where such is offered by the supplier.

- The credit card shall be issued by Lloyds, the Trust bankers.
- The PIN for each card shall be known only by the cardholder and not disclosed to anyone else or written down.
- In the event of lost or stolen cards, the loss should be reported by the cardholder to the issuing bank, the police (if stolen) and the CFO, immediately.
- Should fraud or misuse be suspected, the bank should be informed immediately, so that the appropriate action can be taken.
- The balance on the credit card will be paid from the main Trust bank account, in full, each month, and charged back to the school.
- The credit card transactions should be entered onto the Trust finance system, as soon as possible, to ensure the completeness of accounting records.
- All receipts shall be authorised by either the Headteacher or Finance Officer.
- The cards shall not be used for personal expenditure under any circumstances.
- Cash withdrawals are **not** permitted.
- The cards cannot be used for travel and subsistence claims by the employee (e.g. fuel), with the exception of fuel for the school's minibus.
- All authorised cardholders shall sign to accept they have personal responsibility for transactions on "their" card, which are not conducted with the approval of the school and/or Central Finance Team, in accordance with this policy. Refer to Appendix 2.
- The cardholder shall also authorise the Central Finance Team to recover the cost of any unauthorised transactions, and where reimbursement is not received, then the Central Finance Team is authorised to make a salary deduction for the unauthorised amount.
- Cardholders shall be made aware of the action to be taken in the event of a card being stolen, lost or missing (see Appendix 2).

Separation of duties is fulfilled by the following.

- If staff require goods via the internet, they must liaise with the School Business Manager/Finance Officer (school-based staff) or Finance Team (centrally based staff) to place the order online, providing they have sufficient budgetary provision, and request the Headteacher, or the deputy, to authorise the purchases (school based staff) or CFO/ Finance Manager (centrally based staff).
- The Finance Officer/School Business Manager/ CFO authorises the purchase order and the use of the card offsite.
- Cardholders only can make purchases.
- The Finance Officer/School Business Manager records expenditure on the Schools PS Financial system.
- The Headteacher/CEO authorises receipt of transactions submitted by the cardholder.
- The CFO will review receipt of transactions raised by Headteacher.
- Members of the Central Finance Team reconcile direct debits on the bank account statement against the credit card statement.
- Cardholders are personally responsible for downloading card statements each month.

38.0 Cash Management

- 38.1 the purpose of this is to ensure that cash is properly safeguarded, deposited to the bank in a timely manner, and cash transactions are recorded accurately in the accounting records.
- 38.2 Bank accounts
- 38.3 The CFO and CEO are responsible for proposing the banking institute and negotiating the terms and conditions.
- 38.4 Any changes to security access rights of Headteachers, Deputy Headteachers and School Business Managers, are to be prepared and authorised by the CFO and Operations Manager.
- 38.5 Each school should only hold one local bank account for the receipt and deposit of local funds. All bank accounts must be set up by the CFO and the Operations Manager, on the Lloyds Commercial Banking System.
- 38.6 The Trust is not allowed to borrow funds, and no account should be allowed to become overdrawn. The Trust will not enter into any loan arrangements without the prior approval of the Secretary of State.

39.0 Payments and withdrawals

- 39.1 All payments will be made from the main Trust bank account and authorised in accordance with the bank mandate.
- 39.2 Requests for cheque payments should be made to the Trust's CFO. No cheques are to be held by academies unless specific authority has been granted by the CFO.
- 39.3 Cancelled or unissued cheques should be retained for inspection.
- 39.4 Cheques should be cancelled and reissued, if appropriate, if they remain uncashed after 6 months.

40.0 Deposits

- 40.1 Official, pre-numbered school receipts should be issued for all cash and cheques received, where no other formal documentation exists. All cash and cheques must be kept in the finance office safe, prior to banking. Banking should take place every week, or more frequently if sums collected exceed the insurance limit on the safe.
- 40.2 Monies collected must be banked, in their entirety, in the appropriate bank account. There will be reconciliations between the sums collected, the sums deposited at the bank and the sums posted to the accounting system, with appropriate segregation of duties.
- 40.3 The Trust cash and cheques must only be banked in properly approved, and controlled, accounts, in the name of Diocese of Hereford Multi-Academy Trust.

41.0 Bank reconciliation

- 41.1 Bank reconciliations are a key element of financial control, and should be completed at least once a month, as part of the month end procedures. Reconciliations must ensure that:
- All bank accounts are reconciled to the nominal ledger.
 - All reconciliations and outstanding items are reviewed.
 - Adjustments arising are dealt with promptly.
- 41.2 Where bank reconciliations are carried out by the Central Finance Team, it is the responsibility of school Finance Officers to provide information in a timely manner, as and when requested.
- 41.3 Bank statements are obtained monthly. Schools have access to online banking and can, therefore, review the bank account on an ad hoc basis, as required.

42.0 Petty cash

42.1 It is proposed that petty cash will be removed from Trust schools from September 2020, in favour of electronic payment methods, such as purchasing cards, BACS and Faster Payments. The Trust will not permit cash transactions to be entered into. All income must be banked in its entirety and is not available to be used for cash payments.

43.0 Financial Probity

43.1 It is important that Members, Directors, LGB members and members of staff act, and are also seen to act impartially.

43.2 The Members and the Board of Directors of the Diocese of Hereford Multi-Academy Trust (Trust) seek to run all aspects of the Trust's financial management and business activities with high standards of conduct and integrity.

43.3 The Trust is committed to tackling fraud and other forms of malpractice and treats these issues seriously. It is recognised that some concerns may be extremely sensitive.

43.4 In the event that Members, Directors, LGB members, members of staff, parents or the community at large become aware of activities which give cause for concern, this Financial Probity Policy is provided as a reference to establish a framework within which issues can be raised confidentially. The process allows for concerns to be raised within the Trust and school environment, allows recourse to external parties outside the management structure of the Trust or school, where this becomes appropriate, and provide for a thorough and appropriate investigation of the matter, to bring it to a satisfactory conclusion.

43.5 In May 1996, the Nolan Committee published a report on standards in public life, as applicable to local public spending bodies. The report identified the following seven principles that should be applied to public life:

- Selflessness
- Integrity
- Objectivity
- Accountability
- Openness
- Honesty
- Leadership

43.6 One important means by which the Trust can demonstrate that it is applying these principles, is by maintaining a register of business and pecuniary interests.

- 43.7 The report also made a number of recommendations in relation to whistleblowing. The Nolan Committee used the term whistleblowing to mean the confidential raising of problems or concerns, within an organisation, by a member of staff. This is not “leaking” information, but refers to matters of impropriety, for example, a breach of the law, Trust/school procedures or ethics. Also, whistleblowing is not the raising of a grievance (which would be dealt with under the Staff Grievance Procedures). The term whistle-blower denotes the person raising the concern or making a complaint.
- 43.8 Existing good practices with the Trust, in terms of its systems of internal controls, both financial and non-financial and the external regulatory environment in which it operates, ensures that cases of suspected fraud or impropriety rarely occur.
- 43.9 This document is a public commitment that concerns are taken seriously and will be actioned.

44.0 Guiding Principles

- 44.1 The current version of the Academies Financial Handbook, and this Finance Policy, represent the context within which the schools working with the Trust operate financially.

45.0 Business and Pecuniary (monetary) Interests

- 45.1 The Members, Directors, LGB members and members of staff have a responsibility to avoid any conflict between their business and personal interests and affairs, and the interest of the Trust.
- 45.2 The Trust and the schools maintain registers of business and pecuniary interests, that list for Members, Directors, LGB members and certain members of staff, any business interests that they, or any members of their immediate family have. The register must be available for inspection by staff, parents, auditors and the DfE. The staff that are required to register their business and pecuniary interests are those in management posts and / or those involved in the procurement of goods and services.
- 45.3 The maintenance of the register helps the Trust Members, Directors, LGB members and members of staff to meet the requirements for withdrawal from meetings, due to a conflict of personal interest, as stated in the DfE Academy Trust Governance Guide and with reference to the Academies Financial Handbook.

45.4 The register should include all:

Business Interest declarations: including directorships, shareholdings and other appointments of influence within a business or other organisation that may have dealings with the school/Trust. The disclosures should also include business interests of related persons, such as parent, spouse, child, cohabitee and business partner, where influence could be exerted by that person over a Member, Director, LGB member or a member of staff.

Members, Directors, LGB members or members of staff should declare if they have been disbarred from being a director of a company, or if there have been issues with any County Court Judgements since the last return.

And

Pecuniary Interest (monetary): such as providing suppliers or services to the school for staff, other than their contracted job within their role as Member, Director or LGB member.

45.5 Where a Member, Director, LGB member or member of staff or related person has any interest, either pecuniary or non-pecuniary, in a matter to be discussed at a Members' Trust Board or LGB's meeting, the Member, Director, LGB member or member of staff must declare their interest and withdraw from that part of the meeting.

45.6 Where a Member, Director, LGB member or member of staff, or related person, has a pecuniary interest in a business, and that interest exceeds limits that may be specified in the Trust's Memorandum of Understanding or Articles of Association, the school must not enter into a contract or arrangement (such as the purchase of goods and services) with that business. For example, a school would not generally be permitted to trade with a company whom a Member, Director, LGB member or member of staff holds more than 1% of the share capital.

45.7 It is the responsibility of a Member, Director, LGB member and member of staff to ensure their declarations of business interests are kept up to date at all times, and to amend or update them as necessary.

45.8 All Members', Directors' and LGB members' meetings' agendas will contain a standing item for attendees to declare any changes to their declarations of interests.

- 45.9 At the beginning of each academic year, every Member, Director, LGB member and member of staff will be required to complete the appropriate form (See Appendix 3) and should ensure that it is updated throughout the year, as and when any Business or Pecuniary Interest may arise. Nil returns will also be required, where a Member, Director, LGB member or member of staff has no such interest.
- 45.10 Staff should also be aware, for their own and the school's protection (whoever is appropriate in the case in question), to ensure that they let others know of any circumstances that they believe other could think might affect their judgement.
- 45.11 The Trust is required to record and publish business and pecuniary interests.

46.0 Gifts and Hospitality

- 46.1 Members, Directors, LGB members and members of staff should avoid accepting excessive hospitality, entertainment or other services from existing or prospective suppliers. They are required to inform the Trust CFO of offers, as detailed below, of gifts and hospitality offered in connection with their links with the school or Trust, as they arise, and whether the offer was accepted or declined (see declaration Appendix 4).
- 46.2 The acceptance of gifts and hospitality can potentially compromise Members, Directors, LGB members and members of staff. Great care should be taken in dealing with commercial organisations, and the following guidance should be followed:

Recommendation limits Gifts, Hospitality, Entertainment or other services	Information on acceptance/referral/declaration
Below £50 (occasional/one off)	Deemed acceptable (see guidance below). Declaration not required.
Below £50 (regular)	Advisory Bank – please refer to Trust CFO as to whether declaration of offer to be registered.
Between £50 and £250	Advisory Bank – please refer to CFO as to whether declaration of offer to be registered.

Over £250	Declaration of offer to be registered whether accepted or declined.
NB: Any gifts/favours that are sustained or Members, Directors, LGB members, staff has concerns about that may compromise their integrity should be documented.	

46.3 The following examples of gifts and favours are considered acceptable, if given on an occasional basis:

- A modest business dinner to discuss business.
- Attendance at trade fairs or similar events, whether there is a general invitation to customers.
- Attendance at a company anniversary celebration; However, permission should be obtained from the Headteacher in respect of members of staff in schools and CEO for all other staff. The CEO will obtain permission from the Chair of the Board of Directors.

46.4 The Trust is required to publish information about Gifts and Hospitality, declared and received.

47.0 Anti-Fraud Policy and Procedures

47.1 The Anti-Fraud Policy is required to ensure that the Trust is protected, to the best of its ability, against fraudulent activity which could result in financial losses and reputational risks.

Aims

- To avoid any fraudulent activity from both internal and external parties.
- Protect the Trusts resources.
- To provide a clear reporting process to all stakeholders when fraud is suspected.
- To meet DfE audit regulations.

How

- Staff training to identify how to avoid being subject to fraudulent activity.
- Robust financial control measures are in place to reduce fraudulent risk.
- Clear protocols and processes followed when any fraud is suspected.
- Communication to the wider staff on the use and purpose of the policy.

47.2 The Trust is committed to the prevention of fraud and the promotion of anti-fraud culture.

- 47.3 The Trust operates a zero-tolerance attitude to fraud and requires all staff, Members, Directors, LGB members and volunteers to act honestly and with integrity at all times and to report all reasonable suspicions of fraud.
- 47.4 The Trust will investigate all instances of actual, attempted or suspected fraud, and will seek to recover any losses and pursue appropriate sanctions against the perpetrators; this may include criminal prosecution, disciplinary action, legal proceedings and professional sanctions.
- 47.5 The policy applies to all staff (full - time, part - time, temporary and casual), consultants, contractors, volunteers and Trust Members and Directors, and Local Governing Boards.

48.0 Definition of Fraud

- 48.1 The term 'fraud' is often used to describe complex financial offences, such as false accounting. However, in its simplest form, fraud is lying. Some people will lie, or withhold information, or generally abuse their position to try to trick someone else into believing something that isn't true. Examples might include:
- Sending fake invoices for goods and services that were not ordered or received.
 - Use of the Trust's or school's, credit card to make personal purchases.
 - Submitting false claims for sickness or expenses.

49.0 Key Responsibilities

- 49.1 The CFO is responsible for:
- Developing, implementing and maintaining adequate systems of internal control that prevent and detect fraud.
 - Testing the systems of internal control and seeking independent assurance when appropriate.
 - Regularly reviewing the anti-fraud policy, and compliance with it, to ensure it remains effective and relevant to the needs of the Trust.
 - Reporting allegations of actual, attempted or suspected fraud to the Board of Directors.
 - Ensuring all allegations of fraud are investigated appropriately, in compliance with relevant policies, procedures and legislation and commencing disciplinary and/or legal action where appropriate.

49.2 The Board of Directors is responsible for:

- Overseeing the financial performance of the Trust, including its assets, making sure the Trust's money is well spent, and measures are in place to prevent losses or misuse, including arrangements for preventing and detecting fraud.490.3

Staff are responsible for:

- Familiarising themselves with the types of fraud that might affect the Trust.
- Ensuring they adhere to the agreed policies and procedures, thereby protecting the Trust's reputation and assets from fraud.
- Reporting allegations of actual, attempted or suspected fraud to the CFO, CEO and/or Board of Directors.
- Assisting in the investigation of suspected fraud when requested to do so, for example, by providing witness statements.

50.0 Reporting Suspicions

50.1 The Board of Directors and staff are important elements of the Trust's stance on fraud and are required to raise any concerns that they may have. The Board of Directors and CEO will deal with any financial irregularities robustly.

50.2 Staff should immediately report any concerns about actual, attempted or suspected fraud to the CEO. However, if the concerns relate to the Trust CEO staff should report their concerns to the Chair of the Board of Directors.

50.3 Under no circumstances should staff investigate the matter themselves.

50.4 Should a Member, Director, LGB member or member of staff wish to seek advice about how to deal with allegation of fraud, or want to report the matter anonymously, they should contact the Trust's Auditors, (Bishop Fleming).

50.5 The Public Interest Disclosure Act 2013 protects employees who raise concerns about certain matters of public interest in good faith. Staff can obtain free independent advice from the charity <http://www.pcaw.co.uk>

50.6 A referral Form has been provided at Appendix 5 to use as a guide to the type of information should be captured when an allegation of fraud arises.

51.0 Fraud Response Plan

51.1 The Trust has established guidelines for senior staff and Board of Directors to use and the immediate actions to be taken in the event of a fraud being discovered or suspected. It covers how, and when, to seek professional advice, securing evidence and preventing further losses. (Reference Appendix 6 – Fraud Response Plan)

52.0 Support for Witnesses

- 52.1 Members, Directors, LGB members, members of staff and the public may be feeling vulnerable before, during and after they have brought an allegation of fraud to the attention of the Trust.
- 52.2 Witnesses should be assured that they have acted appropriately, by raising their concerns; they should be referred to the Confidential Reporting and Whistleblowing Policy and reminded that the Trust does not tolerate reprisals, victimisation or harassment, and will take all reasonable action to protect them.
- 52.3 In addition, the Trust will take steps to minimise any difficulties anyone may experience as a result of raising a concern. For instance, if they are required to give evidence in criminal or disciplinary proceedings, the Trust will advise or arrange for them to receive advice and support about the process being followed.

53.0 Investments

The Trust has significant cash balances arising from:

- 53.1 Timing differences between Grant receipts, and Payroll and PAYE payments.
- 53.2 General reserves arising from the front loading of grant payments, through the annual cycle.
- 53.3 This has been developed to safeguard the interests of the Trust and to maximise the returns to the Trust, with the minimum of risk. It provides clear guidelines under which investments can be made.

54.0 Responsibilities of the Board

When considering investments, the Board must:

- Act within their powers to invest, as set out in their Articles of Association;
- Have an investment policy to manage, control and track their financial exposure, and ensure value for money, particularly if using unfamiliar investment techniques;
- Exercise care and skill in all investment decisions, taking advice as appropriate from a professional advisor;
- Ensure that security takes precedence over revenue maximisation;
- Ensure that all investment decisions are in the best interests of the Trust, and command broad public support;
- Review the Trust's investments and investment policy regularly.

55.0 Outline of Policy

The policy for investment will cover all of the following criteria:

- 55.1 The Trust is risk averse in order to preserve the principal sum.
- 55.2 The Trusts forecast cash on a short and long-term basis, to identify level of funds available for investment.

55.3 The Trust ensures that sufficient funds are available to deal with day-to-day requirements and that a contingency of one month's salary cost is built in before funds are invested for more than one month.

55.4 The Trust identifies a range of instruments which can be invested in.

55.5 The Trust restricts investment to sterling-based products and allow no foreign exchange risks.

56.0 Claims from DfE

56.1 Capital and Implementation grants must be managed such that, as far is possible, funds are received from DfE in advance of invoice payments being made.

57.0 Management

57.1 The responsibility for the identification and placement within the policy lies with the CFO, who must recommend all investments for Board approval, within the scope of the policy.

57.2 Investment of funds (other than movements between Lloyds current accounts) must be formally authorised by the CEO and CFO.

57.3 All new investment accounts or other vehicles must be approved by the Board of Directors prior to opening.

58.0 Size of Investments

58.1 No individual investment shall exceed £500,000, without prior approval from the Chair of the Board.

58.2 No more than £2,000,000 shall be held with any one counterparty (excluding balances in the Lloyds current and deposit accounts)

59.0 Credit Ratings

59.1 All investments shall carry at least ONE of the following minimum recognised Credit Ratings:

- Short-term investments
- Long-term investments

60.0 Maturities

60.1 Maturities can be from one month and up to three years but must on average be no more than one year overall.

61.0 Approved Investments

61.1 The following shall be the only Approved Investments, in which the Trust can invest:

- a) Interest bearing current account
- b) Bank demand deposits
- c) Bank term deposits/Money Market Deposits
- d) Certificates of deposit
- e) Commercial paper
- f) Medium term notes
- g) UK Government gilts
- h) Corporate Bonds
- i) Building Society accounts

62.0 Approved Counterparties

62.1 The following list of counterparties shall be the only parties through which investments are made:

- a) Lloyds TSB

62.2 The use of any other counterparties shall be subject to prior Board approval.

63.0 Reporting

63.1 Reports of investment activity shall be tabled at each meeting of the Finance and Resources Committee, showing individual investments (who, rate, maturity), average maturity, rate of return against target.

Appendix 1

Asset register – recording template



DATE CHECKED	CHECKED BY (NAME)	SIGNATURE

ASSET REGISTER	
DATE PURCHASED	
EQUIPMENTTYPE	
DESCRIPTION	
MAKE/MODEL NUMBER	
SERIAL NUMBER	
QUANTITY *	
OWNED / LEASED	
ORDER NUMBER	
SUPPLIER	
COST WHEN PURCHASED	
SOURCE OF FUNDING (BUDGET)	
DATE OF DISPOSAL	

ASSET REGISTER

REASON FOR DISPOSAL	
METHOD OF DISPOSAL ****	
VALUE WHEN DISPOSED	
AMOUNT RECEIVED	

APPENDIX 2 Credit Card [“the Card”] Cardholder Consent Form

I consent to be the cardholder on the following credit card account held by **Diocese of Hereford Multi-Academy Trust**.

School: _____

Credit Card Issuer: _____

Card Number _____

I confirm that I have read the Trust Credit Card Policy [“the Policy”] and that I will abide by its terms and conditions.

I acknowledge and agree that:

1. I will use the account only to purchase items/services on behalf of the school or Trust and not use the account for any personal expenditure.
2. I will only purchase items/services in accordance with the Policy.
3. I will take care of the card whilst in possession, to avoid its loss or theft.
4. I will not disclose to any other person, or write down, the Card PIN.
5. I will only use the Card security number for online purchases, where a security number is requested, and on a secure (indicated by padlock system) internet website.
6. I will not use the Card to withdraw cash.
7. I understand that upon discovery of loss or theft of the Card, I must as soon as possible notify:
 - a. The issuing bank.
 - b. School Business Manager/Central Finance Team
 - c. The police (only in the event of theft).
8. I understand that I am personally liable for all charges on the account, which relate to transactions which have not been conducted in accordance with the Policy.
9. I accept that I must reimburse the Trust promptly, should I cause the account to incur any unauthorised charges and in the absence of prompt reimbursement, I authorise the Trust to recover all unauthorised charges by deduction from any amount otherwise owing to me by the Trust, including but not limited to salary and expenses.
10. I agree that if I cease to be employed by the Trust, I will immediately return the card to the Headteacher/Finance Team.

11. I will download the statement relating to my card each month

Staff member: _____

Signed: _____ Date: _____

Central Finance: _____

Signed: _____ Date: _____

Appendix 3



Diocese of Hereford Multi-Academy Trust Year Ended 31st August xxx	
Name	
Address	
Job Title	
Other directorships	
Trusteeships	
Shareholdings	
Other interests	
Interests of spouse/domestic partner	n/a
Interests of dependents or domestic partner's dependents	n/a

I confirm that the above is a complete and accurate record of my business and related interests for the year ended 31 August xxx

These details have been provided in order to assist in the compilation of the related party transaction disclosures in the year-end statutory accounts. Where there have been no material transactions with any of my business interests, no disclosure is required.

I will make the Clerk aware of any changes with regard to the above.

1. Are you aware of any instances of suspected, alleged or actual fraud taking place in the period from 1 September 20xx to date?
2. Are you aware of any legal action being made against the Trust or where the Trust is pursuing legal action against another party?
3. Are you aware of any significant events taking place during the period that you feel the auditors should be aware of?
4. Have you been banned from acting as a Trustee of a Charity or a Director of a company during the period from 1st September 20xx to date?

Signed: _____

Date: _____

Appendix 5

FRAUD REPORTING FORM

If you have any concerns about fraud, please print and complete this form and address it to the Chief Executive Officer, Unit 11, The Business Quarter, Ludlow Eco Park, Sheet Road, Ludlow, SY8 1FD. If the concern raised relates to the Chief Executive Officer, please send the form to the Chair of the Board of Directors at the above address.

You do not need to give your name. All the information provided will be treated in confidence.

Name of the person(s) or organisation you suspect:

Address: (if known)

Place of work / department / job title: (if known)

Please provide details of your suspicions. You should include as much information as possible. For example, what was said in telephone or other conversations, dates, times and places, vehicle used, as well as the names of any other parties involved. (Continue on a separate page if necessary and attach any additional evidence you may have.)

Your details: (please leave blank if you wish to remain anonymous)

Name:

Telephone number or contact:

Address:

Appendix 6

FRAUD RESPONSE PLAN

It is important that allegations of actual, attempted and suspected fraud are not ignored. Even seemingly insignificant concerns may later reveal larger, previously unknown problems.

Securing Evidence

Ensure that any concerns are recorded fully. Whenever possible keep written notes that cover:

- Names, addresses and dates of birth;
- Descriptions (height, build, hair colour, ethnicity, clothing, distinctive features);
- Dates and times of key events;
- Vehicle registration numbers and descriptions;
- Details of any conversations had or overheard;
- Details of any actions or incidents that were observed;
- Telephone numbers;
- Company and/or business details.

Secure any physical evidence, such as original invoices, receipts, letters, emails, cheques and application forms. Try to minimise how many people and how often evidence is handled. Fingerprint evidence can very quickly be destroyed.

If any of the evidence is on a computer, immediately unplug the computer from its power source. Do not attempt to shut the computer down through its operating system, as this can alter or destroy key files and documents.

Whilst initially securing the evidence, it is important not to be tempted to begin a more substantial investigation, or accuse individuals directly, without seeking professional advice (see 'Seeking Advice' below).

If an investigation is undertaken without following the appropriate policies, procedures and legislation, or if individuals are accused without sufficient evidence, it may lead to the perpetrators avoiding a disciplinary, criminal or civil sanction.

Preventing Further Losses

It is important to minimise any additional losses. For example, if the allegations concern the theft or loss of banking passwords, PIN's or similar credentials notify the bank immediately. Equally, if the losses relate to a weak process, for example cash is routinely kept unsecured in a drawer, ensure that the process is changed, at least temporarily, until more permanent and improved processes can be implemented.

Seeking Advice

When an allegation of fraud is discovered, it is important to seek professional advice as soon as possible. Advice can be sought from the Trust's Chief Finance Officer, and the Police. General advice about fraud is available from Action Fraud: www.actionfraud.police.uk