



Oxford Diocesan
BUCKS SCHOOLS TRUST

FINANCIAL PROCEDURES MANUAL

September 2019

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Introduction

Purpose and compliance

The purpose of this manual is to ensure that the academies within Oxford Diocesan Bucks Schools Trust (ODBST) maintain and develop 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 the funding agreement with the Secretary of State.

ODBST and its academies must comply with the principles of financial control outlined in the guidance published by the Education and Skills Funding Agency (ESFA) in the Academies Financial Handbook 2019 and any subsequent versions or revisions. This manual expands on that and provides detailed information on accounting procedures to be followed by all ODBST academies. **All staff involved with financial systems and management should be familiar with both documents.**

Compliance with this manual is mandatory and any contravention of procedures should be brought to the attention of the relevant Headteacher and the ODBST Chief Finance Officer (CFO).

Relevant documents

Academies Financial Handbook 2019 (and subsequent versions), The Academies Financial Handbook sets out the financial management, control and reporting requirements that apply to all academy trusts. It describes a financial framework for trusts that focuses on principles rather than detailed guidance and reflects their accountability to Parliament and to the public.

Compliance with the handbook is a condition of each trust's funding agreement.

https://assets.publishing.service.gov.uk/media/5d035c0eed915d0a80fe0665/Academies_Financial_Handbook_2019.pdf

Academies Accounts Direction

The Academies Accounts Direction 2018 to 2019 sets out the requirements, and provides guidance, for academy trusts in preparing their annual report and financial statements for accounting periods ending on 31 August 2019. The document also provides relevant guidance for academy trusts' auditors.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/795646/Academies_accounts_direction_2018_to_2019.pdf

Your academy's Supplementary Funding Agreement (SFA), issued by the ESFA

Code of conduct for everyone involved in the management of an academy's finances

Everyone involved in managing an ODBST academy's finances is expected to behave honestly, openly and in the best interests of ODBST and its trustees, the academy and its governors, staff,

students and parents, and to adhere to the rules laid out in this manual and in the other publications mentioned above. This is underpinned by the following requirements:

- **Basic dos and don'ts** (edited) taken from HM Treasury's handbook "Regularity, Propriety and Value for Money" 2004
 - Don't bend or break the rules
 - Don't deceive or knowingly mislead
 - Don't allow a conflict of interest to affect, or appear to affect, decisions
 - Don't use public money for the private benefit of yourself or others
 - Do comply with the law
 - Do put in place and follow clear and up-to-date procedures
 - Do seek approval first, and from the right person where required
 - Do record the reasons for decisions
 - Be honest, impartial and fair.

- **Standards expected in all public services**, taken from HM Treasury's "Managing Public Money" 2016
 - (The standards are): honesty, impartiality, openness, accountability, accuracy, fairness, integrity, transparency, objectivity and reliability
 - (...and work must be carried out): in the spirit as well as the letter of the law; in the public interest; to high ethical standards; (and should) achieve value for money.

Organisational structure of ODBST

Constitution

ODBST is a company limited by guarantee and an exempt charity. The charitable company's memorandum and articles of association are the primary governing documents of the Academy Trust.

Members

Members of the Trust have a similar role to shareholders of a company. They subscribe to the memorandum of association and have the power to appoint and remove trustees in certain circumstances.

Board of Trustees

The Board of Trustees of ODBST has overall responsibility for the administration of its academies' and its own finances. The main responsibilities of the Board are prescribed in the Funding Agreement between ODBST and the Secretary of State and the Academies Financial Handbook for the financial year.

The role of the Board of Trustees in respect of finance is as follows:

- To appoint a chief executive
- To approve the annual budget for ODBST and its constituent academies.
- To approve the Annual Accounts Return.
- To receive, consider and act upon information about the financial performance of the Trust at least six times a year.

ODBST Finance Resources Audit Pay and Personnel Committee (FRAPP)

The FRAPP committee is responsible to the Board of Trustees and has particular financial responsibilities as follows:

- To produce and maintain financial procedures manuals for academies and for ODBST itself, and to review them regularly.
- To undertake a financial assessment of schools wishing to join ODBST, for consideration by the Board.
- To agree budget plans for academies and for ODBST, for consideration by the Board
- To consider and approve budgets, budget changes, asset disposals and other matters as defined by the limits described in the financial scheme of delegation.
- To consider management accounts and reports on a regular basis and take such action as is agreed to be necessary.
- To consider annual Financial Statements and make recommendations to the Board for approval.
- To commission and receive reports from internal and external auditors and to determine what actions are to be taken as a result of their reports.
- To review insurance arrangements
- To review financial benchmarking data regularly
- To maintain a register of pecuniary interest
- To oversee the business continuity plan
- To review the risk registers annually
- To receive and consider reports from other committees which have financial implications, and to advise as appropriate.

Chief Executive Officer (CEO) / Accounting Officer

The CEO has overall executive responsibility for the Trust's activities including financial activities, although some of the financial responsibility is delegated to the Chief Finance Officer.

The CEO has responsibility for approving and reviewing budgets, budget changes, staffing changes, asset disposals and other matters as defined by the financial scheme of delegation.

As Accounting Officer for the Trust, the CEO's responsibilities are defined within the Academies Financial Handbook. In summary, this entails the following:

- The AO is personally responsible to the Secretary of State for the resources under their control and must be able to provide assurance of high standards of probity in the management of public funds
- The AO has personal responsibility for regularity, propriety and value for money, as already defined
- The AO is responsible for the maintenance of proper financial records in accordance with existing accounting standards, and for the management of opportunities and risks
- The AO must advise the Board of Trustees in writing if, at any time, in his or her opinion, any action or policy under consideration by them is incompatible with the terms of the Handbook or FA or if the Board appears to be failing to act where required to do so. Where the Board is minded to proceed, and if after considering the reasons given by the Board, the accounting officer still considers that the proposed

action is in breach of the Handbook or FA, he/she must advise the ESFA's accounting officer of the position in writing.

Chief Finance Officer (CFO)

The CFO is responsible for providing financial advice to the CEO, the Finance Committee and the Board of Trustees, and also has the following duties:

- To manage the finances of ODBST and its academies
- To maintain and monitor effective systems of internal control.
- To ensure that proper accounting records are maintained.
- To set and monitor the budget for ODBST
- To monitor the setting of budgets for academies and to recommend their approval by the Finance Committee.
- To review and authorise budgets, budget changes, staffing changes, asset disposals and other matters as defined by the financial scheme of delegation.
- To ensure effective communication with auditors and responsible officers and to inform the finance committee of their reported findings.
- In urgent cases, to authorise expenditure on behalf of an academy if the Headteacher and their designated substitute for authorising are unavailable. In this case, the CFO will notify the Headteacher by email of the action taken.
- To liaise with the various /Headteachers of academies, their Local Governing Bodies and their Business Managers/Bursars/Finance Officers (*hereinafter referred to as Finance Officers FOs*) and to promote and maintain open and effective communications with them.

Academy Local Governing Bodies (LGBs) and their committees

The LGB and its committees, in conjunction with the Headteacher, take overall responsibility for financial matters within their academy, and have the following responsibilities:

- To work with the Finance Officer to construct and review the annual budget plan.
- To authorise in-year budget changes and virements, assuming no worsening of forecast outturn, and excluding revenue/capital swaps and changes to staffing structure.
- To review all purchases in excess of the limit defined in the financial scheme of delegation for authorisation by the Executive Head/Headteacher.
- To review all asset disposals and write-offs.
- To liaise with the CFO to promote and maintain open and effective communications regarding finance-related matters.

Academy Headteacher

The Headteacher, in conjunction with the LGB and its committees, takes overall responsibility for financial matters within his/her academy, and has the following responsibilities:

- To work with the Finance Officer to construct and to review the annual budget plan
- To authorise in-year budget changes and virements up to the limit defined in the financial scheme of delegation, assuming no worsening of forecast outturn, and excluding revenue/capital swaps and changes to staffing structure
- To authorise expenditure and to sign cheques or authorise BACS payments for individual transactions up to the limit defined in the financial scheme of delegation

- To review all asset disposals and write-offs
- To liaise with the CFO to promote and maintain open and effective communications regarding finance related matters.

Academy Finance Officers

The responsibilities of Finance Officers in academies are as follows:

- Day to day management of financial issues.
- To ensure the maintenance of, and adherence to, effective systems of internal control.
- To ensure that all accounting records are properly and accurately maintained and that all financial transactions are recorded promptly.
- To ensure that income is banked as soon as possible after it is received.
- To ensure that payments are made promptly and in accordance with suppliers' payment terms and legal requirements.
- To authorise expenditure up to the limit defined in the financial scheme of delegation.
- To complete bank reconciliations, Month End Financial Controls Return and School Month End Checklist and submitting them to the ODBST CFO and Finance Manager by the 15th day following the month end
- To request the review of asset disposals and write offs by the Headteacher and LGB.
- To report to the Headteacher, the LGB and its committees and to the CFO and Finance Manager of ODBST as required.
- To liaise with the CFO to promote and maintain open and effective communications regarding finance related matters.

Audit and Responsible Officer function

Academies are asked to co-operate with the work of all internal auditors, external auditors or Responsible Officers (ROs) appointed by ODBST in order to comply with the Trust's obligations under the terms of the Academies Financial Handbook

Any member of staff in an academy who is concerned that financial regulations or requirements are, or may be, breached, should report their concerns to one of the following officers, as they consider appropriate, so that the issue may be referred to the auditor if necessary. Reference should be made to the Trust's Whistleblowing and Anti-Bribery policies.

- academy Finance Officer,
- academy Headteacher,
- a member of the academy's LGB,
- the CFO of ODBST,
- the CEO of ODBST, or
- a member of ODBST's Finance Committee.

Budgets

Budget setting

Budgets must be planned on a three-year rolling cycle, must be an integral part of the academy's strategic planning process and links between the budget and the academy's development plan and other objectives must be documented.

The budget and the academy's strategic plan should be documented in detail for the coming year and at least in outline for the following two years.

The budget must take account of expected income and expenditure, bearing in mind:

- known and expected changes to pupil numbers;
- known and expected changes to funding formulae and the impact of changes to factors which affect funding levels;
- reasonable estimates of other income such as for catering and lettings;
- known and expected changes to staffing and the impact of incremental increases and performance management reviews on salary costs;
- the cost of staff recruitment, training and professional development;
- the requirements for curriculum resources to support objectives identified in the academy's development plan;
- the costs of maintaining premises and grounds;
- the costs of utilities, insurances and rates;
- administration costs;
- the likely effects of inflation (which may differ between budget headings);
- the effect of efficiency savings, where they can be identified.

The academy's Finance Officer will usually be responsible for drafting the budget, and will be advised by the Headteacher and LGB, who will provide strategic direction and guidance.

The budget will be created and presented using software as prescribed by the ODBST CFO. At present this is BPS Budgeting from Orovia.

The budget may be supplemented by other documentation and notes as necessary or required.

Budget approval process

The budget and any accompanying documentation must be reviewed in detail by the Headteacher, by the academy's finance or resources committee, and be presented to the full LGB. The review and any comments arising must be minuted.

The full LGB should agree the final version of the budget and documents which are to be submitted to the ODBST FRAPP for approval. Their agreement and any comments arising should be minuted.

The final version should be submitted to the ODBST CFO in accordance with the Budget timetable that will be issued each year.

The ODBST CFO will review the budget.

The ODBST FRAPP Committee will approve the budget or will refer it back to the academy for amendment if necessary.

The Board of Trustees will, if content, authorise the CFO to submit the budget to the ESFA as part of the annual Budget Forecast return. If the Board is not content, the budget will be referred back to the CFO and/or the academy for amendment.

If the budget is amended, it will be necessary to start the approval process again.

The budget must be submitted to the ESFA as part of the Trust's Budget Forecast Return by 31 July.

Budget changes

It may be necessary to update a budget during the financial year if circumstances change or if issues are identified as part of the budget monitoring process. If this is the case, the academy's Finance Officer should prepare a revised version and notes explaining what has changed, why it has changed, and what the impact is expected to be in the current and future financial years. The revised budget must be presented to the Headteacher and the LGB.

The Headteacher and the LGB authorise budget changes and virements, providing there is no worsening of forecast outturn, the authorisation of such changes must be minuted, and the changes should be explained on the next budget monitoring report.

Any budget changes or virements which worsen the forecast outturn should be referred to the ODBST CFO who will notify the CEO. The revised budget will then be referred to the ODBST FRAPP Committee for approval and to the Board of Trustees for authorisation.

Significant variations from budget must be reported to the ESFA by the CFO.

Budget deficits

The Trust is not permitted to set a net deficit budget without the explicit permission of the Secretary of State, and so deficit budgets from individual academies will not normally be accepted.

If, during the year, it becomes apparent that a deficit may occur, either in the current or in future financial years, the academy's LGB, Headteacher and/or Finance Officer should inform the CFO immediately, who will report it to the ESFA as necessary.

Budget surpluses

LGBs, Headteachers and Finance Officers should bear in mind that funds are made available to them for the benefit of the pupils in school in each financial and academic year.

The ODBST CFO has the responsibility to query the holding of a budget surplus where the amount held is either:

- considered to be excessive, or
- if there are no clear plans for its deployment in future years.

Budget Monitoring and Reporting

Central Reporting

The Academies Financial Handbook requires that the Trust must prepare management accounts each month. Management accounts must be shared with the Chair of Trustees each month and with other Trustees six times a year. The format of the management accounts must include:

- an income and expenditure account
- variation to budget report
- cash flows and balance sheet

In order to ensure that the requirements are met, the Trust requires monthly returns from each academy.

Month End Controls Return

The Month End Controls Return is a checklist of month end controls that is completed to ensure the integrity of financial reporting. The return must be completed by the Finance Officer by 15th working day of the month following the reporting period. The return should be emailed to the central finance team together with the following supporting documentation:

- Management accounts report (standard) from PS Financials
- BPS Budget Monitoring report (variance report/commentary and outturn)
- A copy of the bank reconciliation at the reporting period end date
- A copy of the report to Governors where applicable (see below)

The Budget Monitoring Report available in BPS provides the template for variance and outturn reporting. The variance report/commentary should provide an explanation of any budget variances and whether any action is necessary, has taken place or is planned to address them. For instance, if staff absence has given rise to greater use of supply or other cover costs than was included in the budget, will insurance reimbursements offset the extra cost in whole or in part, and has this been shown in the monitoring report? If the whole of the extra cost is not recoverable, what savings are needed or have been identified elsewhere and how will they be monitored? Will there be an impact on the academy's final outturn position? Are there any other consequences to be considered?

The Month End return should be signed by the Headteacher as confirmation that Headteacher review of budget monitoring has been completed.

A copy of the Month End Controls Return can be found in Appendix C.

Cash Flows and Balance Sheet

Cash flows and balance sheets are currently prepared by the central trust finance team. The Trust may request additional information from Academy FOs to facilitate the preparation of these reports.

Local Reporting

Management accounts/Budget monitoring reports should be provided to the academy's LGB Finance or Resources committee regularly and not less than quarterly.

Management accounts/Budget Monitoring should be considered by the academy's full LGB regularly and not less than quarterly.

Any additional financial reports provided governors should be submitted to the central team with the relevant Month End Return.

Payroll Processes

Roles and levels of authority

Changes to an academy's staffing structure are:

- costed by the Finance Officer;
- proposed by the Headteacher to the LGB;
- reviewed by the CFO and the CEO;
- agreed by the FRAPP Committee, and
- authorised by the Board of Trustees.

The Headteacher and LGB, with advice from ODBST where needed, must ensure that:

- personnel are competent, suitably qualified and trained to a level consistent with their responsibilities;
- clear statements of criteria for personnel selection are provided;
- formal job descriptions are provided;
- the academy's pay policy is adhered to;
- statutory obligations regarding safe recruitment policies and procedures are met.

The Finance Officer is responsible for maintaining accurate and up-to-date personnel records and ensuring access to personnel and pay records is only granted to the Headteacher, members of the LGB, auditors, the CFO or the CEO, in pursuance of their duties.

Role of payroll agent

ODBST's payroll agents (*Buckinghamshire County Council (BCC) and Local Government Shared Services (LGSS)*) are responsible for the following:

- making returns to HMRC by the required dates;
- making payments to the teachers' pension scheme and LGPS as appropriate;
- ensuring the accuracy and security of payroll data files;
- maintaining a record of authorising signatures for payments and payroll changes.
- producing reports of payroll charges for the use of ODBST and the academy;
- agreeing with ODBST the response time and costs for any additional work or reports required;
- providing access to data and reports for academy and Trust auditors.

Staff appointment, contract change and contract termination

The appropriate forms must be completed correctly, authorised by the Headteacher, sent to the payroll agent by the agreed means, and copies retained in the relevant person's personnel file.

Supply, casual and overtime payments

Supply work, casual work and overtime must be agreed in advance by the appropriate budget holder.

The budget holder must check claim forms and authorise payment.

Forms must be forwarded to the payroll agent by the agreed means, and copies retained.

Expenses

Expenses must be claimed in accordance with the Trust Expenses Policy, on the appropriate form, and must be agreed in advance with the Headteacher.

The budget holder/Headteacher must check and authorise expenses claims.

Staff expenses forms must be forwarded to the payroll agent by the agreed means and copies must be retained.

Expenses cannot be reimbursed by cash and may only be paid by BACS in exceptional circumstances, where it would be unreasonable to expect an individual to wait for payment.

Payroll charges and reconciliation

Payments for all staff on contract must be checked by the Finance Officer on a monthly basis and reconciled against records of expected costs as calculated in the academy's budget plan. (BPS Payroll reconciliation tool)

Variances must be investigated promptly to ascertain whether the payment or deduction is correct, or whether the budget plan is wrong or out-of-date and must be amended.

If the payment is wrong, the payroll agent and the employee should be informed as soon as possible, and the error corrected.

If the budget is incorrect, a note of the error should be made, and the procedures for budget changes should be followed.

Payments for supply, casual work, overtime and expenses must be checked against the retained copies of claim forms to ensure that they are correct. If a payment is wrong, the employee and the payroll agent must be informed as soon as possible, and the error corrected.

A copy of the monthly payroll reconciliation must be signed by the Headteacher and retained.

ODBST's Finance Manager must check the total payroll charges against payments made from ODBST's bank account every month, to ensure that the totals debited are correct. Any discrepancy must be investigated and notified to the payroll agent immediately, and to the bank if appropriate.

IR 35 legislation and Self-employed persons

IR35 legislation defines the rules for operating PAYE for a worker who directly provides a service through an "intermediary" which in most cases is the workers own personal service company or limited company. IR35 applies when the worker performs a service to the academy through the intermediary that would normally be expected to be performed by an employee. There are a range of criteria against which the worker's role must be assessed to determine whether they fall within IR35.

Since April 2017 the decision as to whether the worker falls within IR35 rests with the end user ie the academy. The academy should complete an IR35 checklist and determine employment status for every worker used by the school regardless of how often their services are used.

Relevant guidance provided by HMRC can be found as follows:

- An **employee** is defined here: <https://www.gov.uk/employment-status/employee>
- Employment status checking tool: <https://www.tax.service.gov.uk/check-employment-status-for-tax/setup>

If you are in any doubt about this issue, please contact ODBST's CFO for further guidance, as there are penalties for non-compliance.

Income

Funding from the Education and Skills Funding Agency (ESFA)

For each academy ESFA funding is paid directly into the Trust bank account:

- General Annual Grant (GAG) funding monthly;
- Rates funding after it has been claimed by each academy (see below);
- Pupil Premium funding quarterly in arrears, in January, April, July and October;
- UIFSM funding annually in July;
- Other revenue grants (Sports premium, Pay award, Pension Increase) as they become due;
- Devolved Formula Capital (DFC) funding annually in July (see below)

To reclaim the cost of rates and each academy should follow the current procedures given on the ESFA website. Funding received will be credited to the Trust's bank account and passed on to the academy in the next cash advance.

DFC is held centrally by the Trust and ringfenced for the use by each academy of its own allocation.

Cash advances

The academy will receive a monthly bank transfer from the Trust's bank account, which is determined by the calculation set out in the Cash Advance Statement. The main elements of the calculation are:

- the amount of GAG funding, rates funding, pupil premium and any other revenue funding credited to the Trust in the previous month by the ESFA
- MINUS the expected payroll charges for the month according to the academy's approved budget
- PLUS OR MINUS the difference between estimated and actual payroll charges for the previous month
- MINUS the central support services charge (see below)
- PLUS any VAT reimbursement received from HMRC
- PLUS OR MINUS any other adjustments according to the notes on the calculation spreadsheet A copy of the calculation of the academy's Cash Advance Statement will be sent to the Finance Officer each month and should be checked against the bank transfer received to ensure they agree.

Funding via the local authority

Funding for early years and some SEN funding comes from the local authority and will be credited directly to each academy's own bank account.

Central support services charge

6% of each academy's GAG funding (excluding insurance funding, rates reimbursements and pupil premium) is payable to ODBST and will be used to provide services to academies as follows:

- services provided by ODBE core level service agreement;
- support from ODBST school improvement team;
- support from ODBST finance team;
- other services as deemed appropriate by ODBST.

The CSS charge will be deducted on a monthly basis and will be calculated as 6% of the amount of the relevant GAG funding received for that month.

The ODBST Board of Trustees reserves the right to vary the percentage CSS charge if the level of service to be provided changes, or if extra services are supplied on a buy-back basis.

Non-funding/Self-generated income

Income may be collected by an academy for:

- services such as pupil meals or adult meals;
- sales such as of book bags, uniform or swimming hats;
- letting part of the academy premises or grounds;
- other chargeable activities or services.

Where appropriate, invoices for income must be issued promptly, payment terms agreed, and amounts outstanding after 30 days from invoice date must be pursued.

Any amounts remaining as outstanding after three months must be reported to the ODBSTCFO.

No amounts of unpaid income may be written off without referring to the ODBSTCFO., The CFO is responsible for reporting total write-offs across the Trust as a whole, above a given level as determined by the ESFA.

ODBST is not currently registered for VAT, therefore no VAT is chargeable on income invoices.

Recording and banking income

All incoming cheques and cash must be recorded on the finance system as soon as possible. Payment by BACS is to be preferred where possible.

All monies must be banked in their entirety into the academy's official Lloyds bank account. The academy's Finance Officer must prepare reconciliations between the sums collected and the sums banked and the sums recorded on the finance system. These reconciliations must be reviewed by a second person and signed monthly by the Headteacher.

Income awaiting banking must be held in a safe, locked cabinet or other secure location, and must not exceed the limit set by the academy's insurance policy.

Events and trips

Records must be maintained for each fund-raising event, in sufficient detail to identify gross receipts and all costs incurred.

Similar records should be maintained for sponsored events and school trips.

Wherever possible ParentPay or Parent Mail applications should be used to collect parental contributions for school trips and events.

Purchasing and procurement of goods and services

Purchasing principles

The staff of ODBST and its academies must make their buying decisions in accordance with the principles of best value, probity, accountability and fairness.

Purchase orders

Purchases should be authorised in advance of the purchase being made in all but exceptional circumstances. This supports good financial management, ensures that sufficient monies are available before the academy's funds are committed, and allows financial reporting to show the most up-to-date position at all times. Circumstances where purchase orders are not necessary are:

- In respect of services such as utilities, telephone bills and service contract such as for regular grounds maintenance and agency staffing where the authorisation of expenditure and ascertaining of best value is deemed to have taken place when the contract for services was signed;
- Urgent small purchases where goods are needed immediately AND raising a purchase order is not practicable AND the cost is small. This should be a rare occurrence, not a regular excuse to evade the proper procedure.
- In respect of services that are costed and approved by the budget holder in advance but may need to change at short notice, such as coach travel for school trips.

Authorisation limits are as described in the financial scheme of delegation.

At least three written quotations should be obtained for all orders over £5,000, and these should be retained for audit purposes. Telephone quotes may be accepted if they are confirmed in writing before the purchase decision is made.

The Finance Officer will record a purchase order on the finance system, which will be emailed to the supplier, or posted/faxed if email cannot be used.

Choosing suppliers

The Finance Officer should advise budget holders about suppliers who have been found to provide quality, quantity, service, timely delivery and price competitiveness. Volume discounts and credit terms are taken into account. Consortia may be used where they provide value for money.

It may be possible in the future to pool purchasing experience from all the ODBST academies in order to compile and maintain a register of approved suppliers, which academies may consult, and which may also enable the Trust to negotiate bulk discounts on behalf of its academies with frequently used suppliers.

Paying invoices

Invoices may be received when goods are delivered or may be sent by post or email later. All invoices must be passed to the Finance Officer as soon as they are received, together with confirmation that the goods received, or services delivered are satisfactory and complete.

If the invoice includes anything which has not been received or delivered, the budget holder should advise the Finance Officer so that the invoice may be queried with the supplier.

Invoices should be paid by BACS where possible, and only in exceptional circumstances by cheque. Payment must not be made in cash.

Invoices should be recorded individually on the financial management system – invoices for the same supplier should not be aggregated into a single transaction.

Supplier payment terms and legal obligations concerning payments to small suppliers should be complied with. Early payment may be made if discounts can be obtained for doing so which outweigh the loss of interest receivable on the monies held in the academy's bank account, and which do not adversely affect the academy's cash flow position.

Authorisation limits for payment of invoices are as described in the financial scheme of delegation. All invoices must be recorded promptly on PS Financials in the periods to which they relate.

Tendering process

All goods and services ordered with a value of over £15,000, or for a series of contracts which exceed £15,000 in total, must be subject to formal tendering processes.

The procedures for tendering are set out in the Purchasing and Competitive Tendering Policy.

Expenses payments to non-ODBST employees (Trustees and Governors)

Procedures for the payment of expenses to Trustees and Governors is set out in the Trustees and Governors Expenses Policy.

Bank account and cash flow management

Bank account

Each academy will be required to have its own bank account with Lloyds Bank plc, the Trust's bankers, from which all non-staffing costs will be paid. Salaries for directly employed staff and the related payments to HMRC, the teachers' pension scheme and the LGPS are paid from the ODBST bank account.

Online banking and the download of electronic bank statements is available via Lloyds Commercial Banking Online. All passwords must remain confidential.

A bank reconciliation must be carried out at least monthly, using the finance system and a bank reconciliation report must be printed signed by the Headteacher and retained for audit purposes.

Any additional bank accounts that existed before conversion must be included in PS Financials with all transactions being posted and monthly reconciliations carried out. Transactions and balances should be kept to a minimum and where possible transferred to the main account. This ensures effective financial control, reduces financial processing and provides transparency for local and central reporting.

Any queries regarding the academy's bank account may be referred to the ODBST CFO or to the Lloyds customer relationship manager, whose contact details will be supplied by ODBST.

Payments

Payments will be made by BACS where possible and only in exceptional circumstances by cheque. Payment to suppliers or to individuals by cash is not permitted.

Authorisation limits for BACS payment runs or for cheque signatories are as described in the financial scheme of delegation.

The payees of cheques which remain unpresented after three months must be reminded to present their cheques promptly. After six months, the cheques may be cancelled, and the payees informed.

All cheque books must be stored in a safe or locked cabinet.

Income

Cash advances will be made to the academy's bank account, by the middle of each month, and are calculated as described in the section on income.

All incoming cheques and cash must be recorded on the finance system as soon as possible.

Payment by BACS is to be preferred where possible.

All monies must be banked in their entirety into the academy's official Lloyds bank account. The Finance Officer must prepare reconciliations between the sums collected and the sums banked, and the sums recorded on the finance system, and these must be reviewed by a second person, and signed monthly by the Headteacher.

Income awaiting banking must be held in a safe, locked cabinet or other secure location, and must not exceed the limit set by the academy's insurance policy.

Business Charge Cards

The Trust currently provides academies and central operations with the Lloyds Bank Business Charge Card facility. Applications for charge cards must be authorised by the ODBST CFO.

Each cardholder is personally responsible for the safe custody of his/her card, and PIN numbers must not be disclosed.

Authorisation procedures for purchases must be observed irrespective of the method of payment.

Receipts must be obtained for all transactions, although in an exceptional case, such as where a receipt is lost or not obtained, a note must be made of the date, the amount spent and what was purchased.

Receipts for purchases or notes of purchases for which the receipts are lost, must be given to the Finance Officer promptly.

The Finance Officer must check charge card statements monthly and must ensure that all transactions are correctly recorded in the finance system. The statements must be signed and dated by the Business Manager / Finance Officer and by the Headteacher to verify that the reconciliation process has been completed.

Cash

Academies will not normally be permitted to hold petty cash balances.

If cash is required, for example for a school trip or as float for a fund-raising event then it may be withdrawn from the bank by the Finance Officer and must be signed for by the person who will be responsible for using it.

Receipts must be obtained for cash spent, although if this is not possible (for example if used to buy ice creams on a trip), a note must be made of the date, the amount spent and what was purchased.

All receipts, notes of unreceipted expenditure and unused cash must be returned to the Finance Officer as soon as possible. Unused cash must be banked, and expenditure must be recorded in the finance system in the usual way.

Cash flow

The academy must always be mindful of its cash flow position. Funding is often received both in advance (e.g. UIFSM) and in arrears (e.g. PPM) and expenditure is often not spread evenly throughout the year.

Overdrafts are not permitted under any circumstances.

If the Finance Officer believes there is a possibility that the academy may have insufficient money in the bank to meet its obligations, he/she must inform the ODBST Finance Director immediately. It may be possible to adjust cash advances to alleviate the problem. If this is not sufficient or possible, other solutions, such as delaying payments (with the agreement of suppliers) may be negotiated, but this can only be done by the ODBST CFO.

The CFO will inform the CEO and the FRAPP committee immediately if any academy has a cash flow problem, and must explain how the problem has arisen, what solutions are proposed, and what the likely impact will be on the Trust as a whole.

The Trust is required to produce cash flow reports on a monthly basis, and this is currently undertaken at Trust level. The central finance team may request additional information from academy Finance Officers to facilitate the preparation of these reports.

Cash Investment

Cash flow projections may indicate that the Trust is holding cash balances in current accounts that are surplus to immediate operating requirements. The Trust may in these circumstances decide to transfer cash funds to higher interest-bearing accounts. The investment of funds will be strictly in accordance with the Trust Investment Policy.

VAT

VAT registration

ODBST is not currently registered for VAT, but if total non-business income exceeds the HMRC threshold £85,000 from April 2017 then the Trust will be required to register.

Non-business income is defined as that which is not concerned with the Trust's main business of providing education, but the precise definition is complicated and so the ODBST CFO must monitor all non-funding income for all the Trust's academies to ensure that if the threshold is approached, advice may be sought on VAT registration.

Unless and until ODBST registers for VAT, academies may not charge VAT on their invoices for income due to them.

Reclaiming VAT on expenditure

ODBST may reclaim expenditure incurred by the Trust and its academies on form VAT 126, and in order to support the cash flow of the Trust and its academies, the form should be submitted monthly other than in exceptional circumstances.

The ODBST CFO or Finance Manager or other appointed agent will collate the VAT information from academies and from ODBST's own records and will submit a VAT 126 claim to HMRC quarterly.

VAT reimbursements received from HMRC into the ODBST bank account will be returned to academies via the cash advance.

Leasing

There are two types of lease:

Finance leases

Operating leases

The finance lease is a form of borrowing and is not allowed under the provisions of the Academies Financial Handbook. An operating lease is similar to a rental agreement and generally allowable.

Before entering into an operating lease schools must refer the agreement to the Trust CFO to confirm the status of the lease. If the CFO agrees that the lease is an operating lease, then the school will be able to authorise the agreement subject to the limits set out in the financial scheme of delegation and the usual considerations of best value regularity and propriety.

Related Party Transactions

From 1 April 2019, Trusts **must report** all transactions with related parties to ESFA **in advance of the transaction taking place**. The transactions must be reported using an online form which will be completed by the Trust.

Trusts must also obtain the **ESFA's approval for:**

- Transactions with related parties that are novel (no previous experience of), contentious (might cause criticism of Trust) and/or repercussive (cause pressure on others to take similar approach).
- A contract with a related party exceeding £20,000 or which takes the total value over £20,000 for the year.

Definition of a related party

In the Academies Accounts Direction 2018/19, the description of a related party includes:

- parties with control over, or controlled by, the entity (e.g. parent & subsidiary companies)
- parties having significant influence over the entity
- key management personnel of the entity, including any director, whether executive or otherwise
- close family members of any of the above
- others subject to control or significant influence by any individual referred to above

Procedure required by Schools

- Identify all transactions with related parties
- Inform the central finance team in advance of the transaction or agreement
- Keep a register at LGB level recording details

Detailed guidance and reporting templates will be provided by the Trust to all SBMs.

Alcohol

The Academies Accounts Direction issued in May 2019 has confirmed that the purchase of alcohol is not allowed even from unrestricted funds.

Insurance

All academies will be enrolled in the Risk Protection Arrangement (RPA) provided by the ESFA which aims to cover all likely insurable events:

- Buildings and contents
- Business interruption
- Employer's liability
- Third party (public) liability
- Governors' liability
- Professional indemnity
- Fraud
- Money in transit
- Personal accident
- UK travel
- Legal expenses

Finance Officers should inform the Trust Chief Operating Officer (COO) any claims to RPA, or incidents that might lead to a claim within five working days.

Schools must arrange and pay for their own insurance for minibuses and other vehicles.

Staff absence insurance is currently at the discretion of the individual academy although the Trust may seek to establish a group arrangement in the future.

Retention of Records

In accordance with Academies Financial Handbook, all academies and the central office must retain financial records for at least six years after the end of the period to which the funding relates.

Fixed Assets and Capital Expenditure

The School Business Manager Should ensure that a Fixed Asset Register (currently Parago Asset Management) is updated on a regular basis.

See the Trust Fixed Asset Policy.

FINANCIAL PROCEDURES MANUAL

FINANCE-RELATED POLICIES & Appendices

September 2019



Empowering our unique schools to Excel

Fixed Assets Policy

| | | |
|---|-----------|---|
| | ODBST x.y | |
| Policy Level: | 2 | ODBST Statutory and Mandatory Policy All schools must adopt these policies with local amendment strongly discouraged. These policies are centrally amended and binding on LGBs from the date of Board approval. They must be displayed on the School's website. Approval for all proposed local amendments must be sought from the ODBST Governance Lead prior to Local Governing Body resolution. |
| Other related ODBST policies and procedures: | | |
| Committee responsible: | FRAPP | |
| Approved by: | FRAPP | |
| Date Approved: | 08-17 | |
| Date for Next Review: | 08-20 | |

In reviewing this policy the Trust Board has had regards to the Equality Act 2010 and carried out an equality impact assessment. It is satisfied that no group with a protected characteristic will be unfairly disadvantaged.

Fixed Assets Policy

1. Purpose

1.1 The purpose of this Fixed Asset policy is to establish a capitalisation, depreciation and disposal policy for tangible fixed assets held by ODBST. This will ensure that the Trust's Balance Sheet correctly reflects the net book value (NBV) of its tangible fixed assets.

1.2 The policy defines the treatment of tangible fixed or non-current assets.

2. Fixed Asset Register

2.1 The fixed asset register consists of a list of items purchased within an accounting period valued over £2,000 (with effect from 1 September 2017) that are considered to have a useful economic life (UEL) of more than one year. This threshold applies to single items only. Fixed assets are categorised as follows:

- A. Land and Buildings
- B. Plant and Machinery
- C. Furniture, fixtures and assets
- D. Vehicles

2.2 Any items that meet the definition of a fixed asset but are below the £2,000 capitalisation threshold, and are considered to be portable, valuable and desirable, shall be recorded as revenue expenditure on the Trust's financial account system (currently PS Financials) and on the Trust's asset management system (for insurance and audit purposes – currently Parago) but not capitalised in the accounts.

2.3 Transactions relating to the Fixed Asset Register will be recorded on the MAT's balance sheet within the financial accounting system.

2.4 All fixed assets and inventory items should have a barcode (asset tag) assigned which should be listed in the respective fixed asset or inventory records. Where appropriate, a security mark indicating the ownership of the property will be affixed to the asset.

2.5 The Fixed Asset Register should be reconciled at least annually to ensure accountability.

2.6 Any discrepancies between the physical count and the register will be reported to the Finance and Premises Committee at the next available meeting.

2.7 All disposals of assets are recorded in the Fixed Asset Register and the appropriate transactions recorded through the financial accounting system and the asset management system.

2.8 All accounting documentation for the purchase of assets is recorded electronically on both the financial accounting system and the asset management system.

3. Depreciation

- 3.1 Fixed assets are to be depreciated to reflect the recoverable amount in the financial statements, over the useful life of the asset.
- 3.2 Assets under construction are not depreciated, because depreciation is appropriate only when assets are in operational use.
- 3.3 Depreciation will be charged as a minimum on an annual basis for preparation of the year end accounts. If deemed appropriate it may also be charged monthly for the management accounts.
- 3.4 Groups of assets will use the same method of depreciation.

The Trust has determined the following depreciation rates, asset life and methods:

| | | | |
|---|-----------------|-----------|---------------|
| Land (see footnote): | | | |
| Freehold not depreciated | n/a | n/a | n/a |
| Leasehold – term of lease | 0.8% pa | 125 years | straight line |
| Buildings (see footnote): | | | |
| Freehold – over UEL | n/a | n/a | n/a |
| Leasehold – shorter of UEL or lease | 2% per annum | 50 years | straight line |
| Improvements >£25,000 | 5% per annum | 20 years | straight line |
| Plant & Machinery | 10% per annum | 10 years | straight line |
| Furniture, Fixtures and Fittings | 20% per annum | 5 years | straight line |
| ICT Equipment: | | | |
| Servers, projectors etc | 20% per annum | 5 years | straight line |
| PCs, laptops etc | 33.3% per annum | 3 years | straight line |
| Vehicles | 20% per annum | 5 years | straight line |

Footnote:

A number of schools occupy land and buildings owned by the Church under a “licence to occupy”. In this situation, the land and buildings are not capitalised in the accounts. Furthermore, improvements to such assets (e.g. new classrooms, extensions) would also not be capitalised. Therefore, all expenditure on improvements to church-owned land & buildings occupied by the school should be recorded as revenue expenditure only on PS Financials.

This said, each year the government updates its “Land and Buildings Collection Tool” (LBCT) which requires a value for church-owned land & buildings to be disclosed. The central finance team is responsible for preparing this information, based on details

provided at conversion, as well as any additional relevant data recorded in PS Financials and the Trust's asset management system.

- 3.5 If the useful life of the asset is determined to be significantly different to the time scales above, this will be reported to the Finance and Premises Committee for a decision on the appropriate rate to apply to that particular asset.
- 3.6 Building Improvements/Site work: Building improvements will be capitalised if they are significant alterations or structural changes that cost over £25,000.
- 4. Disposals
 - 4.1 Multi-academy trusts (or MATs) may dispose of any fixed assets, other than land, buildings and heritage assets, without the approval of the Secretary of State for Education. However, MATs must ensure that any disposal maintains the principles of regularity, propriety and value for money. This may involve public sale where the assets have a residual value.
 - 4.2 Items that are to be disposed of by sale or destruction must be authorised for disposal by the Headteacher and reported to the Finance Committee and, where significant, should be sold following competitive tender.
 - 4.3 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 licenses for software have been legally transferred to a new owner.
 - 4.4 The MAT is expected to re-invest the proceeds from all asset sales for which capital grant was paid in other MAT assets. If the sale proceeds are not re invested, then the MAT must repay to the DfE a proportion of the sale proceeds.
 - 4.5 All disposals of land, buildings and heritage assets must be agreed in advance with the Secretary of State for Education.

Reserves Policy

| | | |
|---|-----------|--|
| | ODBST x.y | |
| Policy Level: | 2 | <u>ODBST Statutory and Mandatory Policy</u> All schools must adopt these policies with local amendment strongly discouraged. These policies are centrally amended and binding on LGBs from the date of Board approval. They must be displayed on the School's website. Approval for all proposed local amendments must be sought from the ODBST Governance Lead prior to Local Governing Body resolution. |
| Other related ODBST policies and procedures: | | |
| Committee responsible: | FRAPP | |
| Approved by: | FRAPP | |
| Date Approved: | 08-17 | |
| Date for Next Review: | 08-20 | |

The Trust and its academies are expected to normally hold contingency reserves from their annual GAG funding or other income to cover a minimum of one month's (maximum three months) budgeting operating expenditure, subject to the constraint that the level of reserve does not exceed the level permitted by the ESFA.

If such a reserve is not already in place, there should be a plan to achieve this within a period of no more than three years. A target level of reserves through transition is set at 5% of total income.



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Loan of Equipment Policy

| | | |
|---|-----------|--|
| | ODBST x.y | |
| Policy Level: | 2 | <u>ODBST Statutory and Mandatory Policy</u> All schools must adopt these policies with local amendment strongly discouraged. These policies are centrally amended and binding on LGBs from the date of Board approval. They must be displayed on the School's website. Approval for all proposed local amendments must be sought from the ODBST Governance Lead prior to Local Governing Body resolution. |
| Other related ODBST policies and procedures: | FRAPP | |
| Committee responsible: | FRAPP | |
| Approved by: | 08-17 | |
| Date Approved: | 08-22 | |
| Date for Next Review: | | |

In reviewing this policy the Trust Board has had regards to the Equality Act 2010 and carried out an equality impact assessment. It is satisfied that no group with a protected characteristic will be unfairly disadvantaged.

Items of equipment belonging to the academy or to the Trust, for example laptops, cameras or musical instruments which are to be removed from academy premises must be recorded in a "Register of Equipment Loans", which must be signed by the academy's Headteacher/Finance Officer, and by the member of staff who is taking the item. No such items may be loaned to anyone who is not a member of staff of the Trust or the academy.

The equipment remains the property of the Trust or the academy and may be recovered at any time.

The person borrowing the equipment must ensure that they have adequate insurance cover in place to pay for a replacement item should it be lost, stolen or damaged while it is on loan. The equipment must not be left in an unattended vehicle.

No benefit in kind may accrue to the person borrowing the equipment, as this may give rise to a tax liability.

The ODBST "Register of Equipment Loans" form follows.

Agreed by the Oxford Diocesan Bucks Schools Trust Board of Trustees on date

For adoption from date

Review: date

ODBST
Register of Equipment Loans
[Name] Academy

| | |
|---|--|
| Employee name | |
| Employee contact details | |
| Nature of equipment | |
| Loan start date | |
| Reason for loan | |
| Name of person authorising the loan | |
| <p>I understand: (1) that no benefit-in-kind is to accrue to me personally arising from the use of this equipment; (2) that the equipment shall remain the property of the school and may be recovered at any time without prior notice; (3) that the equipment is insured by the school for accidental damage and theft only providing it remains in the school.</p> <p>I confirm: (1) that the equipment will be insured during the journey to my home and will not be left in any vehicle unattended; (2) that the equipment will be insured while it is in my home; (3) that I shall treat the equipment with care and ensure that it is kept safe.</p> | |
| Signature of person borrowing equipment: | |
| Signature of Finance Officer: | |
| Date: | |



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Lettings Policy

| | | |
|---|-----------|--|
| | ODBST x.y | |
| Policy Level: | 2 | <u>ODBST Statutory and Mandatory Policy</u> All schools must adopt these policies with local amendment strongly discouraged. These policies are centrally amended and binding on LGBs from the date of Board approval. They must be displayed on the School's website. Approval for all proposed local amendments must be sought from the ODBST Governance Lead prior to Local Governing Body resolution. |
| Other related ODBST policies and procedures: | | |
| Committee responsible: | FRAPP | |
| Approved by: | FRAPP | |
| Date Approved: | 08-17 | |
| Date for Next Review: | 08-22 | |

In reviewing this policy the Trust Board has had regards to the Equality Act 2010 and carried out an equality impact assessment. It is satisfied that no group with a protected characteristic will be unfairly disadvantaged

Lettings policy

All lettings are subject to a letting agreement, setting out the terms and conditions of the academy's letting, including the agreed charge.

The LGB approves letting rates, bearing in mind the cost of arranging lettings, such as for cleaning and overtime for premises staff.

Free use and charges below economic cost are not permitted unless the hire is time limited (for example, as an introductory offer to encourage long term letting) or unless a substantial case is made to the Headteacher and the LGB, clearly demonstrating that the letting contributes significantly to the academy's aims and objectives.

All hiring of academy rooms or premises is recorded on the letting planner kept by the Site Manager/Caretaker and in a lettings diary

The lettings diary and the letting planner are reviewed by the academy's Finance Officer on a monthly basis to ensure that all lettings have been invoiced.

The hirer must complete a hire form when the letting or series of lettings is booked.

All lettings must be invoiced promptly, and at least termly.

The academy must ensure that relevant insurance is in place for each letting.

Agreed by the Oxford Diocesan Bucks Schools Trust Board of Trustees on date

For adoption from date

Review: date



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Gifts and Hospitality Policy

| | | |
|---|-------------|--|
| | ODBST x.y | |
| Policy Level: | 2 | <u>ODBST Statutory and Mandatory Policy</u> All schools must adopt these policies with local amendment strongly discouraged. These policies are centrally amended and binding on LGBs from the date of Board approval. They must be displayed on the School's website. Approval for all proposed local amendments must be sought from the ODBST Governance Lead prior to Local Governing Body resolution. |
| Other related ODBST policies and procedures: | | |
| Committee responsible: | FRAPP | |
| Approved by: | Trust Board | |
| Date Approved: | 08-17 | |
| Date for Next Review: | 08-22 | |

In reviewing this policy the Trust Board has had regards to the Equality Act 2010 and carried out an equality impact assessment. It is satisfied that no group with a protected characteristic will be unfairly disadvantaged.

Aim and Objectives

Through this 'Gifts and Hospitality Policy and Procedure', ODBST aims to do the following.

- Help staff, governors and trustees to follow, and be seen to follow, the highest ethical and moral standards in any dealings, relationships with individuals and/ organisations/ contractors that involves offers or receipts of gifts and hospitality.
- Maintain a culture of honesty and transparency of transactions and disclosure of information in the practice of receiving gifts and hospitality by any party with whom there is a business arrangement.
- Assess and monitor the nature and the extent of its exposure to potential external and internal risks whilst recording and maintaining a register in line with good practice.

General principles

- While corporate hospitality and gifts may be a feature of the business world, ODBST as a charitable company is working in a different context.
- At all times, employees, governors and trustees should consider the potential perception arising from the acceptance of gifts and the impact on ODBST's reputation.
- Gifts and hospitality should only be accepted when doing so is in the interests of ODBST and not for personal gain or to bias the employees' decisions on behalf of ODBST.
- Token gifts of the kind provided at conferences or trainings courses, such as business pens or stationery, are permitted without further action on the part of the recipient.
- Other gifts or hospitality with a value of less than £50 may be accepted provided they are reasonable in the circumstances and consent has been obtained where possible in advance. If in doubt, you should consult with your line manager. This includes a seasonal gift (Christmas box of chocolates; single bottle of wine; drinks reception within network).
- Subject to paragraph above, gifts received will be deemed to belong to ODBST and whether the employee will be permitted to keep the gift in particular circumstances, will be at the discretion of the Board of Trustees.
- Gifts of money must never be accepted.
- Invitations to lunch or dinner from an individual or an external organisation may be accepted when the primary reason is to meet with representatives of the hosting organisation or representatives of other organisations who may have business interests or activities in common with the respective Board. Otherwise, please consult the ODBST Finance Director.
- Corporate hospitality must be approved in advance by the academy Headteacher, ODBST Finance Director or Accounting Officer.
- On some occasions, it will be appropriate to give a small token of thanks to a volunteer or colleague.
- Hospitality or gifts offered to clients or contractors must be agreed in advance with your Headteacher or the ODBST Finance Director

Receipts of gifts, hospitality, entertainment or other services

Trustees, governors and members of staff involved in making buying decisions should not accept excessive, frequent or regular gifts, hospitality, entertainment or other services from existing or prospective suppliers.

When considering whether to accept such offers, they must consider whether they could affect their independence or cause concern that they might affect their independence. The ODBST Finance Director and each academy's Finance Officer will maintain a register of gifts and favours offered and whether these were accepted or rejected.

Trustees, governors and members of staff are required to inform the Finance Director of ODBST of such offers as they arise.

ODBST Board of Trustees: gifts, hospitality etc. exceeding £100 p.a. cumulative from one third party, must be reported to the ODBST Finance Director.

Local governing body: gifts, hospitality etc. exceeding £100 p.a. cumulative from one third party, must be reported to the Clerk to the LGB.

Expenditure on Gifts, Hospitality, Entertainment and Favours

The Local Governing Body will approve any expenditure as detailed below on gifts, hospitality, ex-gratia payments and losses to be written off. The academy will maintain a log of these. Such expenditure is only authorised if the Local Governing Body can demonstrate that they have taken into account the principles of probity, accountability and value for money.

Expenditure on hospitality from public funds is only incurred in the provision of education. Hospitality is generally only provided in the workplace and usually restricted to tea/coffee, biscuits, soft drinks or sandwiches. Modest hospitality is occasionally provided outside the workplace. The Finance Officer will maintain a register of the occasions when hospitality is provided, the number of people involved and the costs incurred.

Local Governing Body

- Chair of Governors to approve up to £200.
- Full LGB to approve £200 to £1,000.
- Local Governing body refer to the Finance Committee and Chair of Board at ODBST if more than £1,000;

ODBST

- Chair of Trustees and Accounting Officer up to £1,000.
- Full Trust Board if more than £1,000.
- Before Board meetings, a copy of the Register will be circulated for comments on items over £1,000 only.

Private Use

- The academy does not obtain goods or services for the private use of governors and members of staff.
- Governors and members of staff may not:
 - hold any interest in any equipment or property held or used for the academy;acquire any interest in the disposal of academy equipment or property at the end of any contract between the academy and any third party.



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Register of Business and Pecuniary Interests Policy

| | | |
|---|-----------|---|
| | ODBST x.y | |
| Policy Level: | 2 | ODBST Statutory and Mandatory Policy All schools must adopt these policies with local amendment strongly discouraged. These policies are centrally amended and binding on LGBs from the date of Board approval. They must be displayed on the School's website. Approval for all proposed local amendments must be sought from the ODBST Governance Lead prior to Local Governing Body resolution. |
| Other related ODBST policies and procedures: | | |
| Committee responsible: | FRAPP | |
| Approved by: | FRAPP | |
| Date Approved: | 08-17 | |
| Date for Next Review: | 08-21 | |

In reviewing this policy the Trust Board has had regards to the Equality Act 2010 and carried out an equality impact assessment. It is satisfied that no group with a protected characteristic will be unfairly disadvantaged.

Register of Business or Pecuniary interests for Academies

The Governing Body and members of staff who can influence buying decisions recognise their responsibility to avoid any conflict between their business and personal interests and those of the academies.

The Clerk to the LGB must therefore maintain a register of the business interests of each governor, member of staff with significant financial responsibilities, their relatives and other individuals who may exert influence. The register includes:

- interests with suppliers from which the academy may wish to buy goods or services;
- interests in the appointment, salary, promotion or conditions of service of members of staff.

The information in the register is taken into account whenever buying or staffing decisions are made. Any governor or member of staff who has an interest in a business tendering for a contract does not form part of the committee awarding the contract. Any governor or member of staff who has an interest in the appointment, salary, promotion or conditions of service of a member of staff does not form part of the committee recommending or deciding these.

Governors and members of staff will be required to inform the clerk of any changes in their interests as these arise so that they can be entered in the register. The register will also be updated annually. Nil returns are obtained as appropriate. Any governor or member of staff who is unwilling to declare their interests or complete a nil return is not permitted to influence a buying or staffing decision.

The minutes of the Local Governing Body or any other committee which can influence a buying decision will record a standard agenda point seeking updates to governors' business interests.

The only exception to the requirement to disclose a business interest is that if the interest is so distant or small that no ordinary right-thinking person would expect it to influence a person who might have dealings with the firm concerned. In such cases, it need not be disclosed. An example is a modest shareholding in a large public company even if the academy has or may have dealings with the company.

The register is freely available for inspection by governors, staff and parents via the academy web site

The ODBST form follows.

Agreed by the Oxford Diocesan Bucks Schools Trust Board of Trustees on date

For adoption from date

Review: date

Declaration of Interests Form

I of Oxford Diocesan Bucks Schools Trust have set out below my interests in accordance with Clauses 6.39(b) and 97-98 the Articles of Association and guidance on Connected Persons as defined by the Charities Act.

| Category See explanatory notes overleaf | <i>Answers should refer clearly to you and to any connected person as indicated overleaf</i> |
|---|--|
| Current employment and any previous employment in which you continue to have a financial interest. | |
| Appointments (voluntary or otherwise), e.g. trusteeships, directorships, local authority memberships, magistracy, tribunals etc. | |
| Membership of any professional bodies, special interest groups or mutual support organisations. | e.g. trade union membership |
| Companies in which you hold more than 1% of the share capital. | |
| Gifts or hospitality in excess of £100 accepted in the last 12 months (or such other figure as is given in the Academies Financial Handbook). | |
| Any contractual relationship with ODST(B) or any company or other organisation connected with the Multi Academy Trust. | e.g. with the local authority or ESFA |
| Any other interests which you consider are appropriate to disclose and are not covered by the above. | e.g. governorship of another school, MAT or FE College in the County |

To the best of my knowledge, the above information is complete and correct. I undertake to update as necessary the information provided, and to review the accuracy of the information on an annual basis. I give my consent for it to be used for the purposes described in the conflicts of interest policy and for no other purpose.

Signed:

Date:

Position (delete as appropriate): Member
 Appointed Director/Trustee
 Co-opted Director/Trustee
 Senior Staff position:.....



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Staff Expenses Policy

| | | |
|---|-------|---|
| Policy Level: | 1 | <u>ODBST Trustee Policy</u> Owned and applicable at ODBST Board level |
| | 2 | <u>ODBST Statutory and Mandatory Policy</u> All schools must adopt this policy with local amendment strongly discouraged. These policies are centrally amended and binding on LGBs from the date of Board approval. Approval for all proposed local amendments must be sought from the ODBST Governance Lead prior to Local Governing Body resolution. |
| Other related ODBST policies and procedures: | | |
| Committee responsible: | FRAPP | |
| Approved by: | | |
| Date Approved: | | |
| Date for Next Review: | | |

In reviewing this policy the Trust Board has had regards to the Equality act 2010 and carried out an equality impact assessment. It is satisfied that no group with a protected characteristic will be unfairly disadvantaged

Policy overview

The purpose of this policy is to set out what expenses can be claimed by employees and the procedure for making an expenses claim. The policy takes into account HMRC rules on such expenses. The policy also covers the steps staff must take to ensure they are adequately insured when using their own transport. This policy applies to all staff working for Bucks Schools Trust (the Trust) and any individual school within the Trust.

1. General

- 1.1 Claims for reimbursement of travelling expenses, subsistence by persons travelling on Trust business and other expenses, should be made on the Trust Expense Claim Form. Employees are required to use the most cost-effective form of transport and reimbursement of expenditure is restricted to the allowance or the amount spent, whichever is less. The Trust will normally reimburse employees only for expenses that they actually and necessarily incur in the course of any business travel.
- 1.2 It is the responsibility of Line Managers to authorise and ensure that expense claims for staff are accurate. All claims must be countersigned by the line manager before being submitted to the appropriate finance office. Valid claims will be reimbursed based on actual cost incurred and not allowance limits.
- 1.3 Any fines or penalty notices incurred by an employee whilst travelling on Trust business are entirely the responsibility of the employee concerned. Fines will not be reimbursed by the Trust under any circumstances.

2. Insurance

- 2.1 Any employee who uses their own vehicle for any journey on Trust business **must ensure that their insurance covers them for business use**. Employees using their own vehicle for Trust business are responsible for ensuring they hold a current driving licence, insurance certificate and M.O.T. certificate (if applicable). Any cost of business use cover is to be borne by the employee and is covered by the mileage allowance.

3. Car Travel

- 3.1 The Trust will reimburse the costs actually incurred by employees of journeys undertaken for business purposes by road but excluding ordinary commuting.
- 3.2 Expenditure on items such as parking, road and bridge tolls will also be reimbursed when supported by receipts.

4. Mileage claims

- 4.1 Mileage allowances can only be paid for business journeys. Claims for travel between an employee's home and the employee's normal place of work cannot be reimbursed. Where an employee travels from home to a location other than their usual place of work for business purposes, mileage can be claimed for the return journey and subsequent journeys associated with travel to other business locations.
- 4.2 Mileage allowances are paid in accordance with the HM Revenue & Customs guidelines, which are reviewed annually. Current rates can be found in table 1 below.
- 4.3 Maximum claims must be made on the Trust Expense Claim Form.

5. Rail Travel

- 5.1 All rail travel must be made in standard class.
- 5.2 Purchase of Rail Tickets: Rail travel should be booked as far in advance as possible to take advantage of any low-cost options that may be available. Where possible rail travel should be booked and paid for in advance by the appropriate finance office or by the school's nominated person, to ensure compliance with booking policies. Employees should forward their booking request (to include reason for travel), to the finance office or nominated person as early as possible.
- 5.3 In exceptional circumstances, for example a late notice booking, an employee may book and pay for their own rail journey, if the travel has been duly authorised in advance. In such cases the cost of travel will be reimbursed through the expense claims process.

6. Taxis

- 6.1 Costs of taxis will be reimbursed only if one or more of the following apply and if supported by a receipt:-
- where the saving of time is important
 - when heavy luggage has to be transported to or from the place of departure on arrival
 - where there is no other suitable method of public transport
 - if a journey is made after dark or the use of public transport would involve a long wait in circumstances in which the person travelling would feel at risk; or where unfamiliar with location and associated Public Transport links.

7. Travel around London

- 7.1 Journeys in London should normally be taken by Underground/public transport rather than by taxi, except where conditions in item 5 apply.

8. Subsistence

- 8.1 The reasonable and necessary cost of accommodation, meals/snacks and beverages incurred by an employee whilst undertaking business away from the employee's

ordinary place of work, will be reimbursed. Claims must be supported by relevant receipts and are subject to the limits shown in table 2 below.

- 8.2 The costs of other hotel 'extras' such as videos, newspapers, beverages not complementing an evening meal and private telephone calls, will not be reimbursed. No alcoholic drinks will be reimbursed.

9. Hotel accommodation

- 9.1 Staff should not normally stay overnight at the Trust's expense before a meeting when it is reasonable to travel on the day of the meeting. An exception to this may be made if in order to arrive in time for an event, the employee would be required to start their journey unreasonably early or if it can be demonstrated to be financially advantageous.
- 9.2 If an employee is required to stay away overnight in the course of their duties, hotel bookings should be made in advance and full advantage should be taken of advanced purchase discounts where available. The employee should ensure that a purchase order is completed and authorised.
- 9.3 Hotels should be selected based on lowest price and value for money and membership of loyalty schemes must not be taken into account. Limits for hotel bedroom rates can be found in table 2.
- 9.4 If a suitable hotel cannot be found within the price limits set by the Trust, authorisation should be requested in advance from the Chief Finance Officer.
- 9.5 Hotel invoices should be settled by the employee and claimed as an expense, if they have not been pre-paid by the Trust.

10. Sundry Business Expenses

- 10.1 Reimbursement of the cost of equipment, materials and services necessarily purchased by employees for the performance of their duties or the business needs of the Trust, can be made **in exceptional circumstances**. Relevant receipts must support the claims and any equipment or materials remain the property of the Trust.

11. Implications for Taxation and National Insurance

- 11.1 By following the HM Revenue & Customs rulings regarding employee liability for Tax and National Insurance contributions - reimbursement of actual travel and subsistence costs should not attract any liability.

12. Submission of Claim Form and Payment

- 12.1 The Expense Claim form, duly completed and signed by the line manager, should be submitted to the HR Manager/ School Business Manager or Bursar and will be paid through the payroll process. Only one claim form should be submitted by the 10th

each month. Claims submitted after this date may not be paid until the following month due to payroll deadlines. Please note that staff claims submitted more than six months after the expenses were incurred will only be paid with the express approval of the Chief Finance Officer.

13. Further Information

Please contact the ODBST finance team for further information on this policy, finance.ODBST@oxford.anglican.org.

Table 1 - MILEAGE ALLOWANCE RATES

| | |
|----------------------|----------------------------|
| Car - £0.45 per mile | Motorbike - £0.24 per mile |
|----------------------|----------------------------|

Table 2 - SUBSISTENCE AND MAXIMUM HOTEL RATES (inc. VAT)

| | |
|---------------------|-------------------------|
| Meals | Breakfast £10.00 |
| | Lunch £15.00 |
| | Dinner £20.00 |
| Hotel accommodation | Up to £110.00 per night |



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Trustees and Governors Expenses policy

| | | |
|---|---|--|
| | | |
| Policy Level: | 1 | <u>ODBST Trustee Policy</u> Owned and applicable at ODBST Board level |
| | 2 | <u>ODBST Statutory and Mandatory Policy</u> All schools must adopt these policies with local amendment strongly discouraged. These policies are centrally amended and binding on LGBs from the date of Board approval. Approval for all proposed local amendments must be sought from the ODBST Governance Lead prior to Local Governing Body resolution. |
| Other related ODBST policies and procedures: | | |
| Committee responsible: | | FRAPP |
| Approved by: | | |
| Date Approved: | | |
| Date for Next Review: | | |

In reviewing this policy the Trust Board has had regards to the Equality Act 2010 and carried out an equality impact assessment. It is satisfied that no group with a protected characteristic will be unfairly disadvantaged.

Introduction

ODBST acknowledges the role of Trustees and Governors in setting the strategic direction and monitoring the performance of the Trust. Although the role is voluntary the Trust wishes to provide a facility for Trustees and Governors to be reimbursed for expenditure which they may incur in the course of their duties. This policy applies equally to all Trustees and Governors within ODBST and details which expenses are payable for attendance at 'Approved Duties'. However, it is always open to any individual to choose whether or not to claim, irrespective of this policy.

Claiming Expenses

The expenses which may be claimed are summarised below:-

- Travel expenses
- Subsistence expenses
- Miscellaneous expenses

All claims submitted for payment must be supported by a valid receipt.

Approved Duties

The following is a list of activities that ODBST has deemed an "Approved Duty" for the purpose of claiming expenses under this policy:

- Properly convened meetings of the Trust and Local Governing Board
- Other duties designated by the Trust or Local Governing Board, e.g. acting as a member of a panel convened for recruitment, disciplinary, pay or other approved reason
- Approved academy visits
- Attendance at a meeting or conference approved by the Local Governing Board

Allowable Expenses

Trustees and Governors may only claim expenses in respect of actual expenditure incurred whilst attending the above meetings, undertaking training/development and otherwise acting on behalf of ODBST. These expenses are not subject to tax as long as only actual expenditure is reimbursed and a valid receipt has been attached to the claim form.

Governors cannot claim 'attendance allowances' i.e. payment for actually attending Governing Board meetings;

Governors may not be reimbursed for loss of earnings.

Travel Expenses

Consideration should be given to the mode of transport to ensure that the most cost effective means of travel is used. The costs of travel by car should be checked against other forms of public transport including rail travel prior to the journey being made.

All payments are on the basis that the journey was actually undertaken and expenditure necessarily incurred. Trustees and Governors are encouraged to coordinate travel arrangements where possible to minimise the costs to the Trust. If Trustees and Governors share transport, only the driver is eligible to claim for the journey. The following may be claimed:

- the approved mileage rates currently in force as set out on HMRC website
- the actual cost of standard rate public transport including bus and train fares (cheap rate fares should be used where they are available)
- the actual cost of car parking, toll road charges
- taxi fares (in exceptional circumstances i.e. no other transport options available and attendance essential).

Mileage claimable must be calculated on the basis of the shortest, most practical route for the journey. Where it is reasonable and practical to use public transport then Trustees and Governors will be expected to do so.

Under no circumstances will ODBST reimburse car parking fines, speeding tickets, damage to a vehicle whilst on official duties or the costs associated with any offences under the Road Traffic Acts.

Trustees and governors who use their own vehicle for any journey on Trust business must ensure that their insurance covers them for this use. Any cost of business use cover is covered by the mileage allowance.

Cost of Meals and Accommodation

The cost of meals purchased by Trustees and Governors required to be at a location away from their home may be claimed. The cost of meals and accommodation will be paid when on a course or otherwise away overnight. These costs must be approved in advance and subject to the approved limits

| | |
|---------------------|-------------------------|
| Meals | Breakfast £10.00 |
| | Lunch £15.00 |
| | Dinner £20.00 |
| Hotel accommodation | Up to £110.00 per night |

The costs of hotel 'extras' such as videos, newspapers, beverages not complementing an evening meal and private telephone calls, will not be reimbursed. No alcoholic drinks will be reimbursed.

Miscellaneous Allowances

Trustees and Governors may claim reasonable expenses for the following costs incurred in carrying out their approved duties:

- Photocopying or printing
- Postage

The Trust will pay up to £10 per annum of this category of expense. Often the Trust can print documents far cheaper than can be achieved on a home printer and therefore, if printed documents are required, these should be requested from the Trust in the first instance.

Payment of Expenses

Expense claims will only be paid if submitted on the Trust approved Expenses form. Unless substantial sums are involved, claims should be submitted termly in arrears and claim forms must be submitted to the Chair of the ODBST for Trustees expenses or the Chair of the Local Governing Board in the case of Governors for review and approval. The Vice Chair in each case will authorise payments in respect of any claims made by the Chair. Payment will be made by the central or academy finance team by BACS transfer.

The Chair of the ODBST or Local Governing Board, Headteacher, Chief Financial Officer or Academy Business Managers have the right to ask for additional evidence to support any expense claims made under this Policy. The Academy Business Manager will maintain a record of claims made including date, name, amount and reason for budget monitoring purposes. Trustees and Governors' expenses are subject to audit.

All claims must be supported by a valid receipt. All receipts which contain VAT must be retained by the Academy in accordance with current VAT legislation. Claims outstanding for more than six months will not be accepted.

Publication of Expenses

ODBST is obliged to publish details of all allowances and expenses paid to Trustees and

Governors on its public website and in its annual accounts

PURCHASING & COMPETITIVE TENDERING

POLICY

| | | |
|---|----------------------------|---|
| Policy Level: | 2 | ODBST Statutory and Mandatory Policy All schools must adopt these policies with local amendment strongly discouraged. These policies are centrally amended and binding on LGBs from the date of Board approval. They must be displayed on the School's website. Approval for all proposed local amendments must be sought from the ODBST Governance Lead prior to Local Governing Body resolution. |
| Other related ODBST policies and procedures: | Health and Safety Policies | |
| Committee responsible: | FRAPP | |
| Approved by: | | |
| Version number | 2.0 | |
| Date Approved: | June 2019 | |
| Date for Next Review: | June 2022 | |

In reviewing this policy the Trust Board has had regards to the Equality Act 2010 and carried out an equality impact assessment. It is satisfied that no group with a protected characteristic will be unfairly disadvantaged

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Policy Statement

This Policy is subject to the published Equality Information, in line with the Equality Duty 2011 and is underpinned by the beliefs and values of our Academy Trust. It should be read in conjunction with the ODBST Scheme of Delegation.

Background

The majority of purchases made by academies will be paid for with public funds. As public bodies, academy trusts must ensure regularity, propriety and value for money in their management of public funds.

Budget holders must be informed of the budget available to them as soon as possible after 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.

Academy Finance Officers are encouraged to discuss with the ODBST Chief Finance Officer occasions where detailed application of the policy is locally challenging.

| Purchase level | Procedure |
|---|--|
| Less than £5000 | A price must always be obtained prior to any order being placed. This price should be attached to the purchase order and filed. Authorisers should ensure probity and best effort to secure value for money and that expenditure is within budget. |
| Between £5,000 and less than £15,000 | At least three written quotations should be obtained prior to any order being placed. These should be attached to the purchase order and filed alongside the rationale for selecting the chosen supplier. Authorisers should ensure probity and best effort to secure value for money and that expenditure is within budget. |
| £15,000 and above | Subject to a formal tendering process. Please see below and contact the ODBST Finance Director for support. |
| Above the Official Journal of the European Union (OJEU) threshold (£181,302 for 2018-19 onwards although this may change) | Subject to a formal OJEU tendering process. Please see below and contact the ODBST Finance Director for support. If ODBST academies wish to enter into multiple contracts to fulfil the same requirement, then the value of those contracts will be aggregated together to decide whether it crosses the threshold. The rules are very specific about this: when offering public sector tenders' contractors must not enter into separate contracts below the thresholds in order to avoid having to apply the regulations. |

Please note that a series of purchases from a single supplier in a single academic year contributes towards that purchase level. Therefore, if an academy places multiple orders with a single supplier and the total purchase level exceeds £5,000 then evidence will need to be provided to demonstrate the rationale for

selecting the chosen supplier

Tendering for purchases of £15,000 and above

Open, restricted and negotiated tenders are all acceptable. Please contact the ODBST Finance Director to discuss and agree the best approach for your project.

Full consideration should be given to the objective of the project, the overall requirements of the academy, the technical skills that may be required, any after sales service and the form of any contract.

Bidders could be asked to suggest how they would address a problem as opposed to being restricted to one solution.

Like should always be compared with like.

All invitations to tender (ITT) must include the background of the project, the project scope and objectives, technical requirements, project implementation, terms and conditions, the form of response, the tender assessment criteria and a reference number. They should also state the date and time by which the tender should be received.

All interested tenderers must be provided with the same information and the same opportunity to visit the site if a site visit is considered necessary.

Contracts above the OJEU (Official Journal of the European Union) threshold (£181,302 for 2018-19 onwards, but subject to change)

It is crucial that you consult the ODBST Chief Finance Officer prior to embarking on any procurement of this nature.

Important Notes

All interests, business and otherwise should be declared prior to tender evaluation. If there is a potential conflict of interest, then that person must withdraw from the tender process and be replaced by a suitable substitute from the Trust. Gifts or hospitality must not be accepted from potential suppliers during the tendering process.

Tenders should be assessed using the tender assessment criteria published in the ITT and full records of the assessment should be kept. A report should be prepared for the ODBST Chief Finance Officer highlighting the issues and recommending a decision. The ODBST Chief Finance Officer is responsible for the acceptance of a tender.

The Department for Education's approval must be obtained where required prior to the acceptance of a tender.

The accepted tender should be the one that is economically most advantageous to the academy and to ODBST.

All tenderers should be informed of the decision.



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WHISTLEBLOWING POLICY

| | |
|---|--|
| | ODBST x.y |
| Policy Level: | 1 <u>ODBST Trustee Policy</u> Owned and applicable at ODBST Board level |
| Other related ODBST policies and procedures: | |
| Committee responsible: | FRAPP |
| Approved by: | |
| Date Approved: | August 2017 |
| Date for Next Review: | |

In reviewing this policy the Trust Board has had regards to the Equality Act 2010 and carried out an equality impact assessment. It is satisfied that no group with a protected characteristic will be unfairly disadvantaged

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Introduction

This policy has been designed to apply to staff employed in academies within the Oxford Diocesan Bucks Schools Trust (ODBST) and much of the text relates to the relationship between the employee and the academy in which they work.

However, staff employed in ODBST academies are employees of ODBST, so there are also references to the relationship between the employee and ODBST where this is appropriate to the operation of this policy.

Overall responsibility for the operation and application of this policy rests with the local governing body of the academy. Depending on the nature of the complaint, however, it may be felt necessary for you to raise your concerns with the ODBST Board of Trustees and not a member of the academy leadership or local governing body. A list of contacts can be found on page 6.

What is Whistleblowing?

Whistleblowing encourages and enables you to raise serious concerns within the academy rather than overlooking a problem or blowing the whistle outside.

As someone who works in the academy, you may be the first to realise that there may be something seriously wrong. However, you may not express your concerns because you feel that speaking up would be disloyal to your colleagues or to the academy.

This policy makes it clear that **you can raise a matter of concern without fear of victimisation, subsequent discrimination or disadvantage.**

It is in the interest of all concerned that disclosure of wrongdoing or irregularity is dealt with properly, quickly and discreetly. This includes the interests of ODBST, the academy, their employees, any persons who are the subject of any disclosure, as well as the person making the disclosure.

Who does it apply to?

- ALL employees of the Oxford Diocesan Bucks Schools Trust.
- Contractors working for ODBST or the academy on academy premises, for example, agency staff, builders or drivers.
- Any suppliers and those providing services under a contract with either ODBST or the academy, in their own premises.
- Self-employed workers.

Our Commitment

The Oxford Diocesan Bucks Schools Trust is committed to the highest possible standards of openness, honesty and accountability. In line with that commitment, you are encouraged, if you have serious concerns about any aspect of ODBST's or academy's work, to come forward and voice those concerns. It is recognised that certain cases will have to proceed on a confidential basis.

The policy has the support of the main recognised trade unions.

What types of concern are covered?

Types of concern may be about, for example:

- Conduct which is a criminal offence or a breach of law.
- Suspected fraud or corruption (please also note that the Audit Commission has produced leaflets for employees and managers about suspected fraud or corruption, copies of which are available from Reading Borough Council)
- Disclosures related to miscarriages of justice.
- Dangerous procedures or activities risking Health and Safety, including risks to the public as well as other employees.
- Discrimination or abuse on grounds of race, gender or disability.
- Damage to the environment.
- Breaches of established standards of good practice or agreed procedures.
- The inappropriate use or breaches of the academy's regulated procedures.
- Action which is contrary to the Code of Conduct for employees or function or conduct of the local governing body.
- Suspected sexual or physical or other abuse of pupils or other staff.
- Other unethical conduct, or
- Safeguarding failures.

Protection for Whistleblowers

ODBST recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. If you believe what you are saying to be true, you should have nothing to fear because in reporting your concern you will be doing your duty to your employer and those for whom you are providing a service.

Neither ODBST nor the local governing body will tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith. If appropriate, the academy's 'harassment' procedure will apply to those who carry out this unacceptable behaviour.

Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary, grievance, capability or other procedures that already affect you.

Confidentiality

ODBST will do its best to protect your identity when you raise a concern and do not want your name to be disclosed, but it must be appreciated that the investigation process may reveal the source of the information and a statement by you may be required as part of the evidence. You will be given prior notice of this and a chance to discuss the consequences if these circumstances arise.

The confidentiality of service users will not be compromised as employees have a duty in law and within their professional codes of conduct to maintain this.

Support for Whistle-blowers

Trade Unions

A trade union representative may accompany or represent you at any meetings in connection with this policy.

Human Resources (HR) Adviser

ODBST has its own HR adviser with whom you can discuss how to make a disclosure and lodge a matter of concern (see below). Staff and non-employees will often discuss the issues that worry them with the HR team in the first instance. Such discussions will be in confidence if that is what you prefer, but there may be some disclosures (for instance criminal acts) that cannot remain confidential. However, you will be given time and space to explore your options to take matters forward.

Anonymous Allegations

This policy encourages you to put your name to your allegation. Concerns expressed anonymously are much less powerful, but they will be considered (at the discretion of the academy's local governing body).

In exercising the discretion, the factors to be taken into account would include:

- the seriousness of the issues raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources or factual records.

Untrue Allegations

If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, it is established that you have made malicious or frivolous allegations, or allegations for personal gain, disciplinary action may be taken against you. In such cases, the academy's disciplinary procedure will apply.

How to raise a concern

The earlier you express concern, the easier it is for someone to take action.

Concerns may be raised verbally or in writing. You should be prepared to set out the background and history of the concern, giving names, dates and places where possible and the reason why you are particularly concerned about the situation. **If you are an employee –**

As a first step, you should normally raise concerns with your immediate manager or the Headteacher. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. For example, if you believe that management is involved, or if you feel that you have not received a satisfactory response to your concern, you should approach the chair of the local governing body or the chair of ODBST trustees if your concern is about the chair of the LGB.

If you are not an employee (e.g. agency staff, contractors, etc.) -

You can discuss your concerns with a relevant colleague or manager within the academy that you are working in – in most cases this would be the Headteacher. You can also seek advice from your own employer. Even though you may not be an employee, you are entitled to raise your concerns with the chair of the local governing body or the chair of ODBST trustees if your concern is about the chair of the LGB. The same safeguards and regards for your protection will apply under this policy.

Because of the difficulty of raising a concern, you may ask your trade union or other representative to accompany you to meet with your manager or other officer. You may also wish to consider speaking to a colleague who may have experienced the same concern.

How the academy will respond

Acknowledgement

Receipt of your concern will be acknowledged immediately and, within five working days of the concern being received, the academy will write to you:

- indicating how the matter will be dealt with;
- giving an estimate of how long it will take to provide a final response;
- telling you whether any initial enquiries have been made;
- supplying you with information on sources of support; and
- telling you whether further investigations will take place, and if not, why not.

Action under the Whistleblowing Policy

The action taken by the academy will depend on the nature of the concern. The matters raised may be followed up in one of the following ways:

- be investigated internally by the academy leadership (it must be emphasised that no-one who is the subject of a complaint or concern will be involved in the handling of it), or through the academy's disciplinary procedures;
- be referred to the Police;
- be referred to an external auditor;
- be the subject of an independent enquiry.

In order to protect individuals and the academy, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of specific procedures, (for example, child protection or discrimination issues) will normally be referred for consideration under the relevant procedures.

Some concerns may be resolved by agreed action between the manager, individual and those whose actions had caused concern. If urgent action is required, this will be taken before any investigation is conducted.

Contact

The amount of contact between the people considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information

provided. If necessary, further information will be sought from you as part of the investigation process.

Attending Meetings

When any meeting is arranged, you have the right, if you so wish, to be accompanied and represented by a trade union representative or a person of your choice who is not involved in the area of work to which the concern relates.

The academy will take steps to minimise any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, the Council will advise you about the procedure.

Outcome

ODBST accepts that you need to be assured that the matter has been properly addressed. Subject to legal constraints, you will receive information about the outcomes of any investigations, and the action that is to be taken. Also, if appropriate, what changes are to be made to monitor procedures to ensure that a similar concern is not raised in the future.

How the matter can be taken further

ODBST hopes you will be satisfied that any matter you raise has been considered properly. If you are not satisfied, and if you feel it is right to take the matter outside ODBST, the following are possible contact points:

- the Local Government Ombudsman;
- ODBST's external auditors
- relevant professional bodies or regulatory organisations (Government guidance, [Blowing the Whistle to a prescribed person: list of prescribed people and bodies](#), is available on the GOV.UK website);
- the police.

If you do take the matter outside of ODBST, you need to ensure that you do not disclose prohibited confidential information.

Agreed by the Oxford Diocesan Bucks Schools Trust Board of Trustees on date

For adoption from date

Review: date



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Investment Policy

| | | |
|---|-----------|--|
| | ODBST x.y | |
| Policy Level: | 1 | <u>ODBST Trustee Policy</u> Owned and applicable at ODBST Board level |
| Other related ODBST policies and procedures: | | |
| Committee responsible: | FRAPP | |
| Approved by: | | |
| Date Approved: | June 2019 | |
| Date for Next Review: | June 2022 | |

In reviewing this policy the Trust Board has had regards to the Equality act 2010 and carried out an equality impact assement. It is satisfied that no group with a protected charecteristic will be unfairly disadvantaged

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1. Aims

This policy aims to ensure that:

- The academy trust's funds are used only in accordance with the law, its articles of association, its funding agreement and the Academies Financial Handbook
- The Trust does not profit from any activities that are inconsistent with Christian values and is mindful of the ethical investment principles established by the Church of England.
- The trust's funds are used in a way that commands broad public support
- Value for money (economy, efficiency and effectiveness) is achieved
- Trustees fulfil their duties and responsibilities as charitable trustees and company directors

2. Legislation and guidance

The Academies Financial Handbook states that academy trusts are required to have an investment policy to:

- Manage, control and track their financial exposure
- Ensure value for money

This policy is based on the Academies Financial Handbook and guidance from The Charity Commission. This policy also complies with our funding agreement and articles of association.

3. Roles and responsibilities

3.1 ODBST trustees

Academy trustees will ensure that investment risk is properly managed. When considering whether to make an investment, trustees will:

- Act within their powers to invest, as set out in our articles of association
- Exercise caution in all investments, reducing risk and ensuring that the trust acts with the utmost integrity
- Take investment advice from a professional adviser, as appropriate
- Ensure that exposure to investment products is tightly controlled so that security of funds takes precedence over revenue maximisation
- Ensure that all investment decisions are in the best interests of the trust, command broad public support and align with ethical investment principles.

Trustees will seek prior approval from the Education and Skills Funding Agency for investment transactions that are novel or contentious.

Novel transactions are those of which the academy trust has no experience; or are outside the range of normal business activity for the trust.

Contentious transactions are those which might give rise to criticism of the trust by Parliament, the public, and the media.

3.2 Finance committee

Academy trustees delegate responsibility for the trust's investments to the Finance, Resources, Audit, Pay and Personnel (FRAPP) committee. The committee is responsible for:

- Controlling and tracking financial exposure
- Reviewing the trust's investments
- Reporting to trustees on investments

3.3 The chief finance officer

The chief financial officer (CFO) is responsible for producing cash flow forecasts and for making decisions on investments. The CFO also provides information to the finance committee and academy trustees, as appropriate.

4. Investment principles

We only invest funds in low risk, and easily-accessible accounts. Funds will be placed in bank accounts with a withdrawal notice of no more than 12 weeks.

Risk is managed through diversification of investments, ensuring that the security of funds takes precedence over revenue maximization.

Funds will only be placed with banking institutions that are regulated by the Financial Conduct Authority and with good credit ratings.

5. Procedures

The authorised signatories are two of the three of; the CEO of ODBST, Chair of FRAPP Committee ODBST and another Trustee from FRAPP ODBST

Before any funds are invested, the 2 authorised signatories will sign to indicate they agree to the investment. An investment authorisation form can be found in appendix 1.

The following information will be recorded about investments:

- Date
- Amount and description of the investment
- Length of investment
- Interest rates/expected return

The CFO will review interest rates and compare them with other investment opportunities annually.

Cash flow and current account balances will be monitored regularly by the CFO to ensure immediate financial commitments can be met and that the current account has adequate balances to meet forthcoming commitments

When there are funds surplus to immediate cash requirements in the current account, we will transfer these to an account with a higher interest rate.

Investments will normally be for a fixed-term that does not exceed one year unless there is a clear rationale for longer-term investment that would benefit the trust.

A maximum of £85,000 will be placed with one financial institution. This is because the first £85,000 of an investment is protected by the Financial Services Compensation Scheme.

Funds, and any interest earned on those funds, will be automatically reinvested unless money

is required for immediate or anticipated expenditure.

6. Monitoring arrangements

The CFO monitors the implementation of this policy.

This policy will be reviewed and approved by the academy trustees every 2 years.



A1: Investment Authorisation Form

| | | |
|--|------------------------|----------------------|
| Date investment made | Duration of investment | |
| Amount | | |
| Interest rate | | Expected return |
| Description of investment | | |
| <i>State what type of investment is being made and how it will benefit the academy trust</i> | | |
| Details of where the investment is held | | |
| <i>Insert name and address of bank or building society</i> | | |
| Signatory name print | | Signatory name print |
| Signature | | Signature |
| Date | | Date |



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DRAFT FRAUD, BRIBERY AND CORRUPTION POLICY

| | | |
|---|-----------|--|
| | ODBST x.y | |
| Policy Level: | 2 | <u>ODBST Statutory and Mandatory Policy</u> All schools must adopt these policies with local amendment strongly discouraged. These policies are centrally amended and binding on LGBs from the date of Board approval. They must be displayed on the School's website. Approval for all proposed local amendments must be sought from the ODBST Governance Lead prior to Local Governing Body resolution. |
| Other related ODBST policies and procedures: | FRAPP | |
| Committee responsible: | | |
| Approved by: | | |
| Date Approved: | | |
| Date for Next Review: | | |

In reviewing this policy the Trust Board has had regards to the Equality Act 2010 and carried out an equality impact assessment. It is satisfied that no group with a protected characteristic will be unfairly disadvantaged.

1. Introduction

- 1.1. Fraud, bribery, corruption, or other dishonesty, would adversely affect the Trust's reputation and put at risk its ability to achieve its objectives by diverting resources from the provision of education for the students.
- 1.2. The purpose of this policy is to confirm the academies commitment to preventing and detecting fraud, bribery and corruption.
- 1.3. The Fraud Act 2006 came into force on 15th January 2007. The Act created a single offence of fraud and defined this in three classes:
 - False representation.
 - Failure to disclose information where there is a legal duty to do so.
 - Abuse of position.
- 1.4. The Act also created four new offences of:
 - Possession of articles for use in fraud.
 - Making or supplying articles for use in fraud.
 - Obtaining services dishonestly.
 - Participating in fraudulent business.

Fraud is different to theft, which is defined in the 1968 Theft Act as:

'A person shall be guilty of theft if he dishonestly appropriates property belonging to another with the intention of permanently depriving the other of it'.

A bribe is:

"A financial or other advantage that is offered or requested with the intention of inducing or rewarding the improper performance of a relevant function or activity, or with the knowledge or belief that the acceptance of such an advantage would constitute the improper performance of such a function or activity" [CIPFA].

There are various Bribery offences, including offering or accepting a bribe (Sections 1 and 2 of the Bribery Act 2010), bribing or attempting to bribe a foreign official (Section 6) and being a commercial organisation failing to prevent bribery (Section 7). While the Trust is not a 'commercial organisation' for its normal activities, it is still considered appropriate for it to have regard to Guidance relating to the Bribery Act.

Corruption is:

"The offering, giving, soliciting or accepting of any inducement or reward which would influence the actions taken by the body, its members or officers."

The term “fraud” is used throughout this policy. For the purposes of this document the term also includes theft, bribery and corruption.

This Policy applies to Trustees, Governors and all employees (full time, part time, temporary and casual) of the Trust and its academies.

1.5. Policy statement

The Trust expects all Trustees, Governors, employees and those acting as its agents to conduct themselves in accordance with the seven principles of public life defined by the Nolan Committee 1995. The seven principles are:

- Honesty - Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest
- Integrity - Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their official duties
- Selflessness - Holders of public office should take decisions solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends
- Objectivity - In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit
- Openness - Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands
- Accountability- Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office
- Leadership - Holders of public office should promote and support these principles by leadership and example.

Responsibility

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

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

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

The responsibility for anti-fraud arrangements is widely dispersed. Trustees have to give clear support to the arrangements. The LGBs and Head Teacher / Head of Campus must provide strong leadership by advocating the academy's arrangements and supporting strong action when these are ignored.

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

Key Procedures and Controls

The following key procedures and controls operate within the Trust:

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

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

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

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

- key personnel are trained in detecting and investigating fraud,
- identified incidents are investigated,
- perpetrators are robustly dealt with,

- the school responds to identified weaknesses in its systems and controls,
- there is any trend in incidents experienced,
- perpetrators are prosecuted,
- recovery of losses is sought.

Audit

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

Raising Concerns

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

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

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

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

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

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



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Example Charging and Remissions Policy

| | | |
|---|-----------|--|
| | ODBST x.y | |
| Policy Level: | 1 | <u>ODBST Trustee Policy</u> Owned and applicable at ODBST Board level |
| | 3 | <u>ODBST Statutory Policy Guidance</u> All Academies must adopt a policy on this topic/area. All Local Governing Bodies will follow and have due regard to this guidance when drafting their local policy. No approval from the ODBST Board is necessary. |
| Other related ODBST policies and procedures: | | |
| Committee responsible: | FRAPP | |
| Approved by: | | |
| Date Approved: | | |
| Date for Next Review: | | |

In reviewing this policy the Trust Board has had regards to the Equality Act 2010 and carried out an equality impact assessment. It is satisfied that no group with a protected characteristic will be unfairly disadvantaged

Members of staff responsible:

Headteachers

Governors

The Governing Body recognises the valuable contribution that the wide range of additional activities, including clubs and visits, can make towards a pupils education. The Governing Body aims to promote and provide such activities as part of a broad and balanced curriculum for the pupils of the school and as additional optional activities.

The relevant statutory provisions are contained in Chapter III of Pt VI of the Education Act 1996. This requires the Governing Body to determine and keep under review a Charging and Remissions Policy. Parents have a right to ask for this information and a summary must be included in the school prospectus. The school must also comply with the Buckinghamshire County Council Scheme for Financing Schools, Finance Section F7 Charges for Educational Activities.

There are two types of financial contributions for which parents can be asked in relation to educational activities:

- Voluntary contributions
- Permitted charges

They have different limitations as set out below.

Voluntary Contributions:

Nothing in legislation prevents a school governing body or local authority from asking for voluntary contributions for the benefit of the school or any school activities. However, if the activity cannot be funded without voluntary contributions, the governing body or head teacher should make this clear to parents at the outset. The governing body or head teacher must also make it clear to parents that there is no obligation to make any contribution.

It is important to note that no child should be excluded from an activity simply because his or her parents are unwilling or unable to pay. If insufficient voluntary contributions are raised to fund a visit, then it is likely to be cancelled. Schools must make sure that they make this clear to parents. If a parent is unwilling or unable to pay, their child must still be given an equal chance to go on the visit. Schools should make it clear to parents at the outset what their policy for allocating places on school visits will be.

When making requests for voluntary contributions to the school funds, parents must not be made to feel pressurised into paying as it is voluntary and not compulsory. Schools should avoid sending colour coded letters to parents as a reminder to make payments into the school or maintenance funds. Schools should also ensure that direct debit or standing order mandates are not sent to parents when requesting for contributions.

There is no limit to the level of voluntary contribution, nor is there any restriction on the way in which such contributions may be used. As such, voluntary contributions may be used to subsidise pupils of lesser means and to pay the travel and accommodation costs of accompanying teachers.

Permitted Charges:

Permitted charges are a direct request to cover certain costs involved with a school activity or visit. No charge can be made in respect of education provided during school hours (which excludes the midday break). Furthermore, no charge can be made for any education provided outside of school hours if this forms part of the syllabus for a public exam, or as part of the National Curriculum or religious education (non-chargeable education). A charge may be made however for board and lodgings on any residential educational visit (subject to the provisions of the LA and school's remissions policy).

The Governing Body recognises the valuable contribution that the wide range of additional activities, including clubs and visits, can make towards a pupils education. The Governing Body aims to promote and provide such activities as part of a broad and balanced curriculum for the pupils of the school and as additional optional activities.

The relevant statutory provisions are contained in Chapter III of Pt VI of the Education Act 1996. This requires the Governing Body to determine and keep under review a Charging and Remissions Policy. Parents have a right to ask for this information and a summary must be included in the school prospectus. The school must also comply with the Buckinghamshire County Council Scheme for Financing Schools, Finance Section F7 Charges for Educational Activities.

There are two types of financial contributions for which parents can be asked in relation to educational activities:

- Voluntary contributions
- Permitted charges

They have different limitations as set out below.

1. Materials & Textbooks

Where a pupil or parent wishes to retain items produced as a result of art, craft and design, or design and technology, a charge may be levied for the cost of the materials used. In the case of Food Technology, pupils usually provide their own ingredients, but if the pupil forgets, the school provides the ingredients and levies a charge. Textbooks are provided free of charge, but in some subjects, additional revision guides are available, for which a charge is made.

2. Music Tuition

Although the law states that all education provided during school hours must be free, music lessons are an exception to this rule.

The Education and Inspections Act 2006 introduced a regulation-making power which allowed the Department for Education to specify circumstances where charging can be made for music tuition. The new Regulations, which came into force in September 2007, provide pupils with greater access to vocal and instrumental tuition.

Charges may now be made for teaching either an individual pupil or groups of any appropriate size (provided that the size of the group is based on sound pedagogical principles) to play a musical instrument or to sing. Guidance about these changes to the charging regulations can be viewed [here](#). Charges may only be made if the teaching is not an essential part of either the National Curriculum or a public examination syllabus being followed by the pupil(s), or the first access to the Key Stage 2 Instrumental and Vocal Tuition Programme (Wider Opportunities).

3. Residential Activities/Activities Outside School Hours

If the activity is held outside school hours and is education other than non-chargeable education, then it is regarded as an “optional extra”. A charge may be made for the full cost of the activity but must not exceed the actual cost of providing the activity. The charge may include the costs of travel, board and lodgings, additional staff costs, entrance fees, insurance, materials and equipment. However, the charge made to individual parents cannot include any cost added to subsidise parents of children who are unwilling or unable to pay the charge.

When is an activity held in school hours?

If the number of school sessions taken up by the visit is equal to or greater than 50% of the number of half days spent on the visit, it is deemed to have taken place during school hours (even if some activities take place late in the evening). Whatever the starting and finishing times of the school day, Regulations require that the school day is divided into 2 sessions. A “half day” means any period of 12 hours ending with noon or midnight on any day.

Example 1: Visit during school hours

Pupils are away from noon on Wednesday to 9pm on Sunday. This counts as 9 half days including 5 school sessions, so the visit is deemed to have taken place during school hours.

Example 2: Visit outside school hours

Pupils are away from school from noon on Thursday until 9pm on Sunday. This counts as 7 half days including 3 school sessions, so the visit is deemed to have taken place outside school hours.

4. Examination Entries

A charge will be levied in respect of examination entries for pupils where the school has not prepared the pupil for the examination.

A charge will be levied in respect of examination entries for pupils where

- the school has prepared the pupil for the examination and
- it considers that for educational reasons the pupil should not be entered and
- the pupil's parent/guardian wishes the pupil to be entered (or pupil him/herself when over 18 years old).

In these circumstances, if the pupil subsequently passes the examination, the school may refund the cost.

A charge may be levied for pupils re-sitting an examination.

A charge will be levied where a pupil fails without good reason to complete the requirements of any public examination where the school paid or agreed to pay the entry fee.

5. Damage/Loss to Property

A charge will be levied in respect of wilful damage, neglect or loss of school property (including premises, furniture, equipment, books or materials), the charge to be the cost of replacement or repair, or such lower cost as the Headteacher may decide.

6. Lettings

The school will make its facilities available to outside users at a charge of at least the cost of providing the facilities. The scale of charges will be determined annually by the Finance Committee and approved by the Governing Body.

Remissions Policy

Where non-chargeable education is provided during a residential visit, parents in receipt of certain benefits (broadly equivalent to those which qualify pupils for Free School Meals) shall receive a complete remission of any charges that would otherwise be payable in respect of board or lodgings.

Government guidance providing details of the benefits which exempt parents from being charged can be found at:

<https://www.gov.uk/government/publications/charging-for-school-activities>

Where charges are to be made by the governing body for optional extras, parents may receive a remission for the whole or part of the charge as set out in the school's remissions policy.

Additional information about charging for school activities (document 3.2c) can be

found at:

<http://oeapng.info/>

Appendix A

Glossary - for the purposes of this manual, the following definitions will apply (adapted from the Academies Financial Handbook 2019):

| | |
|--|--|
| Academic year | The “school year” starting 1 September and ending 31 August. |
| Academy trust | ODBST, being the company, which has entered into a funding agreement with the Secretary of State to run one or more academy schools |
| Accounting officer | Chief Executive of ODBST who has been designated as accountable for regularity, propriety and value for money. In multi-academy trusts it should be the chief executive. |
| Accounting Officer’s Statement on regularity, propriety and compliance | The academy trust’s accounting officer is required to complete and sign a statement on regularity, propriety and compliance each year. This statement must be included in the trust’s annual report and so be submitted to the ESFA at the same time as the annual accounts. |
| Accounting officer’s statement on value for money | The academy trust’s accounting officer is required to complete and sign a statement describing how the trust has delivered value for money each year. This statement must be submitted to the ESFA but does not form part of the trust’s annual accounts. |
| Accounts Direction | The ESFA’s guide for academies on preparing their annual report and accounts. |
| Accounts return | A return of key financial information in spread sheet format based on academy trusts’ annual accounts, to be used for consolidation of trusts’ accounts into the ESFA’s accounts and for the collection of benchmarking data. The ESFA will collect these returns from those academy trusts in scope in a format, and by a date, to be notified. |
| Asset | Anything that is capable of being owned or controlled to produce value and that is held to have positive economic value. Can be “revenue” (e.g. cash) or “capital” (e.g. a building). |
| Board of trustees | The senior committee of an academy trust – also the company board of directors. |
| Capital | Capital assets or funding are those from which an academy trust can expect to derive a benefit for more than one year: typically land, buildings, vehicles, etc. Capital assets are usually referred to as fixed assets. |
| Chief executive | The senior executive of the academy trust and head of the management team. |

| | |
|--|--|
| DfE | Department for Education. |
| Economy | Obtaining an outcome for the least possible input of resources. |
| ESFA | The Education and Skills Funding Agency: an executive agency of the Department for Education that acts as the agent of the Secretary of State. |
| Effectiveness | Obtaining the desired outcome. |
| Efficiency | Obtaining the best possible outcome for the resources input. |
| Executive Headteacher | A head teacher responsible for more than one academy, to whom the Headteachers of each of those academies reports. |
| Finance Director | Chief Finance Officer of ODBST. |
| Finance system | PS Financials. |
| Financial Management and Governance Self-assessment (FMGS) | A checklist for completion and return to the ESFA by a notified date, by new academy trusts that are not yet preparing financial statements and not yet subject to a regularity audit. The return asks trusts to self-assess their financial management arrangements in several specified areas. |
| Financial year | For academy trusts, this is usually the same as the academic year, from 1 September to 31 August. For most other public sector bodies (such as the ESFA) it means the period from 1 April to 31 March. |
| GAG | General Annual Grant: the main source of income for academy trusts. |
| MAT | Multi-academy trust |
| ODBE | Oxford Diocesan Board of Education |
| ODBST | Oxford Diocesan Bucks Schools Trust |
| Headteacher | The head teacher of an academy. |
| 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, behavior and corporate governance. |
| Public funds | Funds which, ultimately, derive from Parliamentary authority. All academy trusts' income, expenditure, assets and liabilities are consolidated into the accounts of the DfE and will be considered by Parliament to be public unless otherwise demonstrated. |

| | |
|--------------------|--|
| Regularity | The requirement to deal with all items of income and expenditure in accordance with legislation, the terms of the trust's funding agreement and this Handbook, and compliance with internal trust procedures. This includes spending public money for the purpose intended by Parliament. |
| Secretary of State | The Secretary of State for Education. |
| SORP | The Charity Commission's document Accounting and Reporting by Charities: Statement of Recommended Practice , which describes the form and content of charity accounts. |
| Special payments | Payments outside the normal range of activities approved by Parliament and therefore requiring greater control. They include ex- gratia payments, staff severance payments, compensation payments and other extra-statutory or extra-contractual payments. See annex 4.13 of HM Treasury's Managing Public Money . |
| Value for money | Achieving the best possible educational 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 academy trust but for taxpayers more generally. |

**Appendix B – ODBST Delegated Financial Authority for Purchasing
Central Trust**

| Financial Limit | Required Authorisation | Procurement Requirements |
|------------------------|-------------------------------|--|
| Over £50,000 | ODBST Trust Board | <ul style="list-style-type: none"> • Expenditure within budget • Ensure probity and best value evidenced by full tendering process |
| Over £25,000 | FRAPP Committee | <ul style="list-style-type: none"> • Expenditure within budget • Ensure probity and best value evidenced by full tendering process |
| £15,001 to £25,000 | CEO | <ul style="list-style-type: none"> • Expenditure within budget • Ensure probity and best value evidenced full tender process |
| £10,001 to £15,000 | CEO | <ul style="list-style-type: none"> • Expenditure within budget • Ensure probity and best value evidenced by 3 written quotes. |
| £5,001 to £10,000 | CEO or CFO | <ul style="list-style-type: none"> • Expenditure within budget • Ensure probity and best value evidenced by 3 written quotes. |
| to £5,000 | CEO or CFO | <ul style="list-style-type: none"> • Expenditure within budget, probity and best value |

Academies

| Financial Limit | Required Authorisation | Procurement Requirements |
|-------------------------|-------------------------------|--|
| £100,000 to OJEU limits | ODBST Trust Board | <ul style="list-style-type: none"> • Expenditure within budget • Ensure probity and best value evidenced by full tendering process |
| £40,001 to £100,000 | FRAPP Committee | <ul style="list-style-type: none"> • Expenditure within budget • Ensure probity and best value evidenced by full tendering process |
| £25,001 to £40,000 | CEO in conjunction with CFO | <ul style="list-style-type: none"> • Expenditure within budget • Ensure probity and best value evidenced by full tendering process |
| £15,001 to £25,000 | CEO | <ul style="list-style-type: none"> • Expenditure within budget • Ensure probity and best value evidenced by full tendering process |
| £10,001 to £15,000 | CEO | <ul style="list-style-type: none"> • Expenditure within budget • Ensure probity and best value evidenced by 3 written quotes |
| £5,001 to £10,000 | CEO or CFO or Head | <ul style="list-style-type: none"> • Expenditure within budget • Ensure probity and best value evidenced by 3 written quotes |
| to £5,000 | CEO or CFO or Head | <ul style="list-style-type: none"> • Expenditure within budget, probity and best value |
| to £1,000 | SBM | <ul style="list-style-type: none"> • Expenditure within budget, probity and best value |

Appendix C



Month End Controls Return

| | |
|--------|--|
| School | |
| Month | |

| Control area | Control checks | Complete | Comments |
|------------------------|---|----------|----------|
| Bank | Main Lloyds Account | | |
| | -Bank reconciliation completed at month end. | | |
| | -Bank reconciliation signed off by Headteacher. | | |
| | School Fund Account | | |
| | -Bank reconciliation completed at month end. | | |
| | -Bank reconciliation signed off by Headteacher. | | |
| Purchases | -All purchase invoices entered for the month. | | |
| | -All credit card transactions entered for month. | | |
| | -Aged suppliers report balances agreed to TB. (signature required) | | |
| | -Review of historic balances | | |
| | -Any debit balances queried. | | |
| | -Agree suppliers statements to Aged Supplier balances. | | |
| | -Accruals identified and posted or notified to the central finance team. | | |
| Sales | -Raise sales invoices for month (lettings, NLE etc) | | |
| | -Aged debtors report balances agreed to TB. (signature required) | | |
| | -Review of historic balances | | |
| | -Query any credit balances. | | |
| Payroll | -Complete payroll reconciliation for month using BPS payroll reconciliation tool. | | |
| Staff Insurance | -Check all staff insurance claims have been made within notice period. | | |
| Budget Monitor | -Management Accounts report run for month. | | |
| | -Consider forecast outturn for year compared to budget and highlight variances. BPS Budget Monitoring form completed. | | |
| | -Prepare summary of explanations for significant variances (commentary) | | |
| | -Copy of report to LGB | | |
| Other | -Highlight any areas of concern to the central finance team. | | |

The Month End Controls Return should be emailed to the Central Finance Team by the 15th working day of each month together with:

- Copy of bank reconciliation
- Management Accounts report
- Variance report/Commentary (BPS Budget Monitoring)
- Report to Governors

A copy of the return to be provided to Chair of Finance.

| | | | | |
|---|------|--|------|--|
| Completed by: <i>School Business Manager</i> | Name | | Date | |
| Reviewed by: <i>Headteacher</i> | Name | | Date | |