



Fladbury
Church of England First School

Finance Policy

Governor Committee Responsible:	Finance and Premises
Status:	Statutory / Non-statutory
Review Cycle:	Annually
Staff Lead:	J Wilson (Head Teacher)
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OUR VISION

Every child at Fladbury will know they are loved by God, have a happy heart and be part of a flourishing, well-led school. When they leave Fladbury, they will be well-prepared to meet challenges, confident in their abilities and look forward to their bright future with an open mind.

John 10:10, "I came that you may have life and have it to the full."

Finance Policy & Procedures

Introduction

The main purpose of this Policy is to set a framework for sound financial management and boundaries within which the Headteacher, Governors and staff can operate. The school's financial arrangements comply with the current financial regulations¹, standing orders and schemes of delegation² issued by Worcestershire County Council and guidance issued by the Government.

Note: *The term governing body is used to mean the full governing body or its committees, where responsibility can be delegated to a committee. Similarly, the term Headteacher is used to mean the Headteacher or other member of the school's staff, where responsibility has been delegated to that member of staff, in particular the Finance Officer.*

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¹ WCC financial regulations and standing orders are available from Worcestershire County Council's website @ www.worcestershire.gov.uk

² A copy of Worcestershire's Fair Funding Scheme for Financing Maintained Schools is available from the Schools Finance Team 01905 844009

³ Further guidance on the School Improvement Plan/School Development Plan, linking the budget to school improvement is available in Summary Document S1.5 The School Development Plan on the FMSiS National Archives Website

⁴ Roles and Responsibilities i.e. written statement of roles and responsibilities of Headteacher and staff with a finance management responsibility. Include a Staff structure chart.

⁵ Further guidance on lettings can be found in the publication "Casual Lettings – The Hiring Out of School Facilities Lettings Policy" Available from the Schools Finance Team 01905 844009

⁶ Guidance about Charges and allowances can be found in the "Information for parents booklet" This explains when charges can or cannot be made e.g. for instrumental music tuition, residential activities, swimming, examinations, school meals and milk, etc and gives guidance on charges for families on low income. The Charges and Remissions policy should be available to parents and carers.

Available on the WCC website: Schools/School Admissions/School Admissions Booklet & Guides

Guidance notes on Charges & Remissions are also available from WCF Governor Services

The school should also have a policy on charges for staff e.g. private phone calls, photocopying etc in their Staff handbook.

POLICY

A Governance

The Governing Body is collectively responsible for the overall direction of the school and its strategic management. This involves determining the guiding principles within which the school operates and making decisions, for example, how to spend the school's delegated budget. It is legally required to agree the school's annual budget plan.

The governing body has a strategic role to realise its mission as a Voluntary Aided school and has responsibility for setting educational and financial priorities, for oversight of sound financial management and for ensuring the budget is managed effectively. It is also responsible for ensuring the school meets all its statutory obligations and, through the Headteacher, complies with the LA's financial regulations or standing orders.

- **A1** The Headteacher is responsible on a day-to-day basis for the management of the school's finances within the approved budget in accordance with the Governor's policy on best value, Appendix A and in line with the School Development Plan, Appendix B. The Headteacher has no authority to exceed the approved budget and must operate within the financial limits of delegated authority, Appendix D. The roles and responsibilities of the Headteacher and other staff in relation to financial decision-making and administration are detailed in Appendix C.
- **A2** A finance committee has been set up to consider strategic financial issues on behalf of the governing body and its remit and membership is reviewed annually.
- **A3** The financial limits of delegated authority of the governing body are detailed in Appendix D. Details of the Committee structure; constitution and current membership are available from the Clerk to Governors.
- **A4** The governing body has agreed with the Headteacher the minimum frequency, level of detail and general format of the financial information to be provided to it, especially in relation to budget monitoring reports Appendix E.
- **A5** Minutes are taken of all meetings of the governing body and its committees and include all decisions and by whom action is to be taken.¹¹
- **A6** The governing body maintains a register of interests of governors¹², the Headteacher and any other staff who may influence decisions in any matter concerning the school. This is open to examination by governors, staff, parents, and the LA. "Declarations of interest" is a standing agenda item on all Full Governors and sub-committee meetings.

¹¹ A Guide to taking minutes for meetings of the Governing Body and its Committees can be requested from WCF Governor Services.

¹² Further guidance and a pro-forma for registering business interests are available from WCF Governor Services

B Financial Planning

The Headteacher and Governors have a clear view of how they intend to use the school's resources in future years to achieve their educational priorities.

- **B1** The school has a School Development Plan (SDP), which includes a statement of its educational goals to guide the planning process.
- **B2** The SDP covers in outline the school's educational priorities and budget plans for the next three years, showing how the use of resources is linked to the achievement of the school's goals.
- **B3** The SDP states the school's educational priorities in sufficient detail to provide the basis for constructing budget plans for the next financial year.
- **B4** Any new initiatives are carefully appraised in relation to all likely costs and benefits and their financial sustainability before being approved by the governing body.
- **B5** The SDP states intended expenditure on any significant changes from the previous financial year.
- **B6** A formal timetable and procedures are drawn up for constructing the SDP and budget to ensure that the governors have time to consider all relevant factors.
- **B7** There is a clear, identifiable link between the school's annual budget and its Development Plan (SDP).
- **B8** The Headteacher presents a draft budget in line with the SDP to the Finance Committee for approval in March, for submission to the LA by the 1 May. This should include sufficient detail and supporting information to enable Governors to make an informed decision. The draft budget will take account of the agreed staffing structure, known inflationary and incremental staff increases and known staffing changes for September. It should cover in detail the next financial year and forecasts for the following two financial years, based on realistic estimates of all expected expenditure and income, including grant income, so that planned expenditure does not exceed the available budget.
- **B9** The governing body ensures that the main elements of the school's budget are periodically reviewed so that historic spending patterns are not unhelpfully perpetuated.
- **B10** The Headteacher profiles¹³ the budget to take account of likely spending patterns taking account of seasonal factors, inflationary factors, and previous trends if appropriate.

¹³ Budget profiling is an accounting term meaning a forecast of spending or income at different times during a year. Comparison with it helps managers to detect when the budget starts to get off track and

- **B11** Any budget surpluses are earmarked for specific future needs to ensure that pupils benefit from a planned approach to spending that does not deprive them of resources in any given year. The Governors have agreed a policy on “reserves”¹⁴ and this is in accordance with the Local Authority regulations on surplus balances¹⁵. The Governors policy is to hold a reserve equal to one teacher’s salary, however, in the current climate this may not be achievable and it will be reviewed regularly.
- **B12** Once the budget has been discussed and agreed by the Finance Committee, it is presented to the Full Governing Body for consideration and approval before the beginning of the relevant financial year.
- **B13** The Headteacher forwards details of the approved budget to the LA by the 1 May each year. Any subsequent budget changes are enacted in accordance with the Scheme of Delegation and notified promptly to the LA. Those schools in a deficit position will need to submit a deficit recovery plan to the LA with the initial submitted budget on 1 May each year.

C Budget Monitoring

The Headteacher and Governors regularly monitor income and expenditure against agreed budgets and maintain financial control by reviewing the current position and taking remedial action where necessary.

- **C1** The Headteacher produces regular budget monitoring reports for income and expenditure, including sums committed but not yet paid and outturn forecasts, against the approved budget. The approved budget is the original budget approved by Governors as reported to the LA, plus any additional funding and any approved virements. These reports are reconciled with the finance system.
- **C2** The Headteacher will provide reports to the Finance Committee and the LA on a regular basis in accordance with the agreed timetable and minimum reporting requirements, as detailed in Appendix E. The Headteacher will

hopefully allows enough time for corrective actions to be taken i.e. it serves as an early warning system.

¹⁴ The school should have a policy on “reserves” which has been explicitly agreed by the Governing Body, at a level they feel is justified for their school. This should be minuted.

¹⁵¹⁶. WCC challenge schools with excess surplus balances. Using DfE guidelines a school's uncommitted surplus balance should be no more than 8% for Nursery, Primary and Special schools and 5% for Secondary schools of in-year funding. In recognition that there are small primary schools in Worcestershire for which an 8% carry forward would be insufficient, the cost of one full time teacher at the top of the main scale (plus on-costs), is also allowed.

Local Authorities are authorised to claw-back surplus balances that are not permitted under their Scheme for Financing Schools. Permitted balances include prior year commitments; unspent grants and funds for other specific purposes agreed by the Local Authority (e.g. building works). Schools will be able to build up reserves towards particular projects but cannot defer implementation indefinitely.

Schools with uncommitted surplus balances in excess of the above limits and not subject to formal re-organisation may be asked to complete a pro-forma providing details of how they intend to spend their surplus. Financial records will be examined to see if this happens.

provide budget monitoring reports to the finance committee at least once a term showing any significant variances against the budget with explanatory notes and, where necessary, remedial action plans including virements.

- **C3** The Headteacher monitors expenditure on the initiatives set out in the School Improvement Plan.
- **C4** Where budget elements have been devolved, departmental budget holders receive, and review reports half-termly (or on request) comparing the amount spent or committed to date against their budgets. The Headteacher monitors these reports periodically and takes action where necessary.

D Purchasing

The School achieves the best value for money they can from all their purchases, whether goods or services as detailed in the Governors Policy on Best Value, Appendix A. In this context, value for money is about getting the right quality at the best available price. This often means looking further ahead than the immediate purchase, especially when selecting equipment, and taking into account associated costs such as supplies and maintenance.

- **D1** The school always considers price, quality and fitness for purpose when purchasing goods or services.
- **D2** Prior approval from the governing body is obtained for all expenditure above the limit predetermined by Governors in Appendix D and F.
- **D3** Competitive quotations/tenders are to be obtained wherever possible in accordance with Appendix D and F. Written quotations should be obtained for all expenditure above the limits predetermined by Governors in Appendix D and F unless it is impracticable to do so. In such circumstances, the reasons for not doing so should be reported to the governing body.
- **D4** Where a quotation other than the lowest is accepted, the reason(s) for this decision is reported to the governing body and included in the minutes of the relevant meeting.
- **D5** All purchases estimated to exceed an amount predetermined by Governors in Appendix F, must be put out to tender, using a form common to all tenderers, on the basis of a detailed description or specification of the goods or services required and in accordance with the procedures set out in Appendix F.
- **D6** Contract specifications for example cleaning, catering and grounds maintenance define the service to be provided in terms of its nature, quality standards, information and monitoring requirements and contract review procedures.
- **D7** The school should not enter into any financial agreement with capital implications without the approval of the Diocese and the LA as appropriate. If a lease arrangement is entered into, this should represent good value for money and be an 'operating' lease, not a financial lease¹⁶.
- **D8** Official, pre-numbered orders are used for all goods and services except utilities, rents, rates, and petty cash payments. Verbal orders are kept to a

¹⁶¹⁷ Further guidance on leasing and a leasing assessment form is available from the Schools Finance Team 01905 844009

minimum, but if required for reasons of urgency or emergency, they must be confirmed by a written order.

- **D9** Orders are used only for goods and services provided to the school. Individuals must not use official orders to obtain goods or services for their or others' private use.
- **D10** All orders must be approved electronically on the school's finance system by a member of staff approved by the governing body to be an authoriser.
- **D11** The authoriser of the order should be satisfied that the goods or services ordered are appropriate and needed, that there is adequate budgetary provision and that quotations or tenders have been obtained if necessary.
- **D12** When an order is placed, the estimated cost is committed against the appropriate budget allocation so that it features in subsequent budget monitoring.
- **D13** The school checks goods and services on receipt to ensure they match the order, and the invoice is marked accordingly, and the check is recorded on the school's finance system. This is not done by the person who approved the order.
- **D14** Payment is made within time limits specified in law for the payment of debts and only when a proper (original) invoice has been received, checked, coded, and approved for payment manually or on e5 for payment. Supplier payment terms and condition should be complied with, and any late charges will be paid from the school budget.
- **D15** The school maintains a list of all Authorising officers and what they are authorising officer for.
- **D16** All paid invoices are stored electronically and uploaded to the finance system.
- **D17** The procurement cardholder and transaction administrators (where applicable) undertake their full responsibilities with the card, including adhering to all security procedures, processing transactions on the portal, posting to the school's finance system and processing any disputes. This is completed in accordance with the published Procurement Card Policy and Procedures

The financial roles and responsibilities of staff and a list of named Budget Holders can be found in the Financial Procedures document Appendix K.

E Financial Controls

The Governors have systems and internal financial controls in place to protect the school's resources from loss or fraud, to safeguard staff and governors and to ensure that information provided about how the budget is being spent is accurate and timely.

- **E1** The governing body ensures that the school has written descriptions of all its financial systems and procedures in the School's Financial Procedures

Appendix K. These are kept up to date and all appropriate employees are trained in their use.

- **E2** The Headteacher ensures that financial control is maintained in the absence of key personnel through staff training or by arranging job shadowing. Staff and Governors have completed a Financial Management Competencies matrix analysis¹⁷.
- **E3** The Headteacher ensures that duties related to financial administration are distributed so that at least two people are involved. The work of one acts as a check on the work of the other and all checks are fully documented.
- **E4** The school maintains proper accounting records and retains all documents relating to financial transactions for at least the period recommended by the LA 6 years plus the current year and will provide auditors with any documentation and explanations they consider necessary. The disposal of records after this period will be undertaken in a secure and appropriate manner as outlined in the ICT policy.
- **E5** There is a clear audit trail, with all financial transactions being traceable from original documentation to accounting records, and vice versa.
- **E6** Any alterations to original documents such as cheques, debtor accounts and orders should be discouraged. Amendments should be made by cancelling the original document and reissuing.
- **E7** All accounting records are securely retained when not in use and only authorised staff are permitted access.
- **E8** The Headteacher ensures that all expenditure from sources of earmarked funding/grants is accounted for separately and transparently and that the funding is used for its intended purpose. Extended School initiatives are also identified separately on finance system.
- **E9** The Headteacher shall immediately inform the Chief Internal Auditor of any loss or financial irregularity or suspected irregularity, or of any circumstances which may suggest the possibility of such loss or irregularity, including any affecting cash, stores or other property of the School.
- **E10** The Headteacher must ensure that all staff have received appropriate training to ensure they are trained to an appropriate level to use the finance systems and carry out financial tasks.

F Income

The Headteacher and Governors have appropriate controls in place to ensure the security of income.

- **F1** The governing body has established a Charges & Remissions Policy for School trips, music tuition, private photocopying, private telephone calls and the supply of other goods or services; see Appendix H. The full governing body reviews these policies annually.
- **F2** Proper records are kept of all income due.

¹⁷¹⁹ You can download the financial management skills matrix for governors from, the "Additional Resources" page in the "Support Notes" section of the DfE SFVS webpages.

- **F3** All lettings are authorised by the Headteacher within a framework determined by the governing body and are recorded in a diary or register; see Lettings Policy Appendix G.
- **F4** The responsibility for identifying sums due to the school is separate from the responsibility for collecting and banking such sums.
- **F5** Where invoices are required, they are issued within 30 days.
- **F6** The school always raises official, pre-numbered WCC receipts and maintains adequate formal documentation for all income collected and paid into the delegated budget. If necessary, a copy of the receipt can be issued. Receipts are securely stored in order.
- **F7** Cash and cheques are locked away to safeguard against loss or theft.
- **F8** Collections are paid into the appropriate bank account promptly and in full. Bank paying-in slips clearly shows the split between cash and cheques and list each cheque individually. The receipt number(s) should also be referenced in the paying in book/sheets when income is banked to provide an effective audit trail between income received and banked.
- **F9** Income collections are banked intact and must not be used for the encashment of personal cheques or for making payments.
- **F10** The Headteacher reconciles monthly the sums collected with the sums deposited at the bank.
- **F11** The school has procedures for chasing any invoices, which have not been paid within 30 days.
- **F12** Debts are written off only in accordance with Appendix D and LA regulations¹⁸, and the school keeps a record of all sums written off.
- **F13** The Headteacher ensures that machines taking money, including telephones, are emptied and the cash counted by two people.
- **F14** The Headteacher ensures that transfers of school money between staff are recorded and signed for.
- **F15** School procedures set out how VAT on income should be accounted for.
- **F16** School procedures stipulate that proper VAT invoices are issued from within the finance system and state WCC VAT registration number, which is GB 705 6721 42.

G Banking

The Headteacher and Governors ensure that bank accounts are properly administered and controlled.

¹⁸²⁰ Writing off debts - where a school has its own bank account, the Governing Body is authorised to write off debts up to a level stipulated by the Chief Finance Officer, but must notify the Authority of any debts approved for write off. The current limit is set at debts up to and including £250. In the case of larger debts and for schools who do not have their own bank account, the school cannot write off these debts but must carry out procedures set out in WCC Financial Regulations and WCC Accounting Instructions. Governors can recommend writing off a debt but must notify Financial Services who has authority to approve that the debt is written off.

- **G1** The school obtains bank statements at least monthly, and these are reconciled with their accounting records. Any discrepancies are investigated.
- **G2** All bank reconciliations are signed by the person performing the reconciliation. They are also reviewed and countersigned by someone who understands the reconciliation process and is a member of the senior leadership team.
- **G3** Individuals should not use their private bank accounts for any payments or receipts related to the school's budget or use the school's accounts for payment of their personal expenditure or income.
- **G4** The school should not enter into any loan agreements¹⁹, other than with the LA, without the prior approval of the DfE and LA.
- **G5** School procedures stipulate that all cheques must bear the signatures of two signatories approved by the governing body. There should be at least three signatories on the bank mandate and at least two of these should be members of the Senior Leadership Team.
- **G6** School procedures ensure that supporting vouchers are made available to cheque signatories to safeguard against inappropriate expenditure.
- **G7** School procedures stipulate that all cheques drawn on the account(s) are crossed 'account payee only' to avoid the possibility of improper negotiation of the cheques.
- **G8** School procedures stipulate that manuscript signatures only are used and cheques should not be pre-signed.
- **G9** Cheque books are held securely when not in use.
- **G10** The Headteacher maintains a list of all banks and building society accounts held and the signatories for each. Governors approve and annually review bank account signatories.

H Payroll

The school purchases payroll services and personnel services from Liberata under a Service Level Agreement. This arrangement is reviewed annually by the Governing Body. The Headteacher and Personnel Committee review and agree annually the school staffing structure in line with the School Development Plan (SDP).

- **H1** The governing body has established procedures, a 'Whole School Pay Policy', for the administration of personnel activities, including appointments, terminations and promotions.
- **H2** The Headteacher ensures that, where practicable, the duties of authorising appointments, making changes to individuals' conditions or terminating the employment of staff are separated from the duties of processing claims.
- **H3** The Headteacher ensures that at least two people are involved in the processes of completing, checking and authorising all documents and claims relating to appointments, terminations of employment and expenses.

¹⁹ Details of the LA loan Scheme are available from the Schools Finance Team 01905 844009
Loans are available for larger purchases, to spread the cost over 2-4 years.

- **H4** The school has sent in the names and specimen signatures of certifying officers to the LA.
- **H5** The Headteacher ensures that only authorised employees have access to personnel files and that arrangements for staff to gain access to their own records are in place.
- **H6** All payroll transactions are processed through the payroll system.
- **H7** The Headteacher maintains a list of staff employed on the SIMS Personnel system and Itrent. Procedures are in place to ensure that this list is updated promptly to reflect new starters and leavers.
- **H8** The Headteacher obtains regular reports on payroll transactions and checks them against the school's documentation on staffing and pay to ensure that they match. Detailed checking takes place to ensure that the right individuals have been paid the right amounts on at least a monthly basis. Any discrepancies are promptly investigated and resolved.

J Petty Cash

There is no Petty Cash held at Fladbury CE First School

K Tax

The Headteacher ensures that the school complies with Value Added Tax (VAT)²⁰ and other tax regulations for example Income Tax²¹ and Construction Industry Scheme (CIS)²².

²⁰²³ For further guidance on VAT, please contact the WCC VAT officer vatenquiries@worcestershire.gov.uk WCC's "Accounting for VAT in schools" publication is available from the Schools Finance Team 01905 844009

²¹²⁴ For further guidance on Income tax, please phone your normal contact in payroll.

²²²⁵

- **Inspection of CIS Vouchers** -Subcontractors will no longer provide vouchers for inspection. Where appropriate, CIS status verification will be performed centrally by the Revenue Section in Financial Services via HMRC's online service.
- **Exemption for LA Schools** - Schools are not required to operate CIS provided that the construction work is commissioned by the School Governors, the Head Teacher, or a member of staff exercising the delegated authority of the Head Teacher **and** payment for the construction work is to be made from the school's delegated budget.
- **School Construction Work that is Not Exempt** - CIS is to be operated for school construction work when any of the following criteria is met - the construction work is commissioned centrally by the LEA or payment for the construction work is to be made from a centrally-managed budget.

Further guidance is available from the Revenue Officer.

- **K1** The Headteacher ensures that all relevant finance and administrative staff are aware of VAT, Income Tax and the CIS regulations.
- **K2** School procedures stipulate that only proper VAT invoices are paid, as the school will not be reimbursed in the absence of such documentation.
- **K3** School procedures set out how VAT on business activities, school trips and other taxable activities should be accounted for.
- **K4** The school makes payments to contractors and subcontractors only in accordance with the Construction Industry Scheme (CIS).
- **K5** The school ensures that any payments to individuals for services such as lecturing, teaching or instructing are made in accordance with the Social Security (Categorisation of Earners) Regulations 1978.
- **K6** The Headteacher must also ensure all appropriate records are maintained to support any claims for VAT or Construction Industry Scheme.

L Voluntary Funds ²³

Voluntary funds for example donations from parents, pupils, and other benefactors are not public money. This section only applies to voluntary funds held that belong to the school and **not** other organisations that have a connection with the school such as the PTA.

- **L1** The Headteacher ensures that voluntary funds are accounted for separately from the school's delegated budget and are held in a separate bank account.
- **L2** The governing body has considered the appropriateness of registering voluntary funds with the Charity Commission²⁴ and has decided not to register.
- **L3** The Finance Committee oversees these funds, and this is reflected in the terms of reference of the Finance Committee.
- **L4** The Headteacher ensures that the same standards of financial accounting which apply to income and expenditure for the school's delegated budget are applied to the voluntary funds and the funds are operated in accordance with "The Instructions for Managing School Funds" (Revised October 2012)
- **L5** Any income which properly relates to the school's delegated budget must not be credited to any voluntary fund.
- **L6** The Headteacher ensures that the audited accounts and supporting documentation are available for the LA Internal Auditors on request.

M Assets and Security

Assets are kept securely and recorded in an inventory.

²³²⁶ "School Private Funds – "Instructions for the Management of School Funds" is available from the Schools Finance Team 01905 844009

²⁴²⁷ A summary of key requirements under Charity Law applicable to schools voluntary funds is available from the Charities Commission Website.

- **M1** The Headteacher ensures that stocks/consumables (for example stationery, art materials) are maintained at reasonable levels and subject to a physical check at least once a year.
- **M2** Up-to-date inventories are maintained of all items of equipment with a replacement value exceeding £100²⁵ or agreed lower value items which are portable and particularly attractive. Such items are identified as school property with a security marking.
- **M3** The Headteacher arranges for inventories/stock books to be checked at least once a year against physical items. All discrepancies are investigated and any over £100 reported to the governing body.
- **M4** Whenever school property, for example musical instruments or computers, is taken off the school site it is signed for, and a register note accordingly.
- **M5** The governing body authorises all write-offs and disposals of surplus stocks and equipment in accordance with the LA's regulations.
- **M6** Safes and similar deposits are kept locked and the keys removed and held away from the school premises.
- **M7** The governing body has a plan for the use, maintenance and development of the school's buildings; see Asset Management Plan at Appendix I.

N Insurance

The Headteacher and Governors regularly consider risks and take out insurance protection as appropriate.

- **N1** The school reviews all risks annually, in conjunction with the LA where appropriate, to ensure that the sums insured are commensurate with the risks.
- **N2** The governing body considers whether or not to insure, risks not covered by the insurer and/or the LA. The costs of such premiums are met from the school's delegated budget.
- **N3** The school will notify its insurers, the LA and other agents as appropriate of all new risks, property, equipment and vehicles which require insurance or of any other alterations affecting existing insurance.
- **N4** The school does not give any indemnity to a third party without the written consent of its insurers, the LA or other agent as appropriate.
- **N5** The school will immediately inform its insurers, the LA or their agent of all accidents, losses and other incidents that may give rise to an insurance claim.
- **N6** Insurance arrangements cover the use of school property, for example musical instruments or computers, when off the premises. Staff are advised that equipment is not insured if left unattended in a car.
- **N7** Details of all risks insured, and the level of cover provided is detailed in Appendix L.

²⁵²⁸ Internal Audit has advised that it would be reasonable for Governors to have an inventory limit of £100 i.e. only include items with replacement value of £100 in your inventory. Schools may choose to include desirable items of a lower value.

P Data Security

The school is required to process and record personal, financial, and other management data and must keep this secure. Much of this data is held in an electronic format rather than on paper, therefore many of the controls in this section relate to IT systems and electronic data. Refer to the School's ICT policy & Acceptable use policy in Appendix J.

- **P1** The school, as a Controller, adheres to the UK GDPR and the Data Protection Act 2018, including registering as a data protection fee payer with the Information Commissioner's Office (ICO) and paying the relevant annual fee. The school's use of any electronic or relevant manual systems to process personal data must comply with this legislation.
- **P2** Computer systems used for school management are protected by password security to ensure that only authorised employees have access. Passwords are changed regularly, updated for staff changes, and are not shared.
- **P3** The Headteacher ensures that data is backed up regularly and that all back-ups are securely held in a secure fireproof location, preferably off-site.
- **P4** The Headteacher has established a recovery plan to ensure continuity of financial administration in the case of emergency.
- **P5** The Headteacher ensures that systems are in place to safeguard school software and data against computer viruses and the virus protection is updated regularly. To prevent viruses being imported, only authorised software is used.
- **P6** The governing body ensures that payment systems used by the school are PCI Compliant, providing the Local Authority with annual assurance of this compliance.
- **P7** The Headteacher must ensure School Finance Team are notified of any leavers holding an e5/CP license to enable the user to be disabled on the employee's contract end date.

APPENDICES

Appendix A

Best Value Statement

This statement relates to the internal controls for Fladbury First School for the 12 months from September 2023 to September 2024. The governing body is responsible for ensuring that the school:

- Keeps proper accounting records during the year which will disclose, with reasonable accuracy and at any time, the financial position of the school, have drawn up in accordance with the DfES' (CFR) guidelines, and will enable it to prepare an annual income and expenditure statement that complies with DfES guideline
- Maintains and operates an effective system of internal control to safeguard all the resources delegated, granted or otherwise entrusted to the school and ensure they are used cost effectively.

The system of internal control has been developed and is coordinated by the Head Teacher. It aims to provide as much assurance as is reasonably possible (not absolute assurance) that assets are safeguarded, transactions are properly authorised and recorded and that material errors or irregularities are either prevented or can be detected promptly.

Our review of the effectiveness of the systems of internal control is informed by:

- Our regular scrutiny of financial and other performance monitoring data
- Regular reports from the Head Teacher and other managers to the governing body
- The most recent report of the school's internal auditor
- Our most recent self-evaluation of the internal controls undertaken (in line with the SFVS audit)
- The school finance risk assessment

We are, therefore, satisfied that the internal control systems in operation at the school during the year were adequate and effective except for those areas highlighted within the LA Internal Audit report and SFVS self-assessment.

We propose over the coming year to take steps to address the weaknesses noted above. Please refer to the "Detailed Audit Findings" report, SFVS self-assessment and the correlating action plans for detail.

By order of the Governing Body of Fladbury First School
(See signed sheet for signatories)

Appendix B

School Development Plan

See separate document attached

Appendix C

Financial Roles and Responsibilities of Head and Staff

Role within school	Name	Financial responsibilities within school
Head teacher	Miss Julie Wilson	<p>the internal organisation, management and control of the school</p> <p>advising on, and implementing the governing body's strategic financial framework</p> <p>giving the governing body enough information to ensure that they are confident that delegated responsibilities and the head teacher's responsibilities have been met</p> <p>being, along with the other staff, accountable to the governing body for the school's financial performance; and</p> <p>drawing up and submitting to the governing body an annual budget plan for the school's budget, and any proposals for revisions to the budget plan as required by the LA scheme for financing schools for maintained schools.</p> <p>obtain governing body approval for any budget virements above her delegated authority level</p> <p>consider and respond promptly to recommendations in school audit/inspection reports, and advise governors of results and any remedial action to be implemented (Audit/Ofsted inspection reports)</p> <p>ensure the maintenance of accurate and current inventories of all attractive and portable items (assets register)</p> <p>ensure the adequacy of the schools insurance arrangements as part of the annual financial review (school insurance)</p> <p>implement school pay policy and appointment procedures (staff pay conditions and recruitment)</p> <p>plan for effective monitoring, evaluating and reviewing of the plan to secure progress and school improvement (school development plan linked to budget expenditure)</p> <p>ensure that resourcing and staffing are dedicated to ensuring the highest standards of achievement for all pupils (skills audit and talent management)</p>

		<p>set appropriate priorities for expenditure, allocate funds and ensure effective administrative control (school plan linked to budget expenditure)</p> <p>manage and organise accommodation efficiently and effectively to ensure it meets the needs of the pupils, curriculum and health and safety regulations (appropriate school assets' plan)</p> <p>manage, monitor and review the range, quality, quantity and usage of all available resources in order to improve pupils' achievements, ensure efficiency and secure value for money</p> <p>Keep a record of sickness and absence for all staff, both teaching and non-teaching and completing relevant forms.</p> <p>Code and record Supply Teacher usage, overtime of support staff, and midday supervision and travel claims.</p>
Finance Manager	Mrs Kate Burston	<p>To be responsible, under the direction of the Headteacher, to deliver financial services to corporate standards and to ensure maximum efficiency and effectiveness.</p> <p>To support the school in attaining its aims and objectives by providing an effective administrative service within the establishment and assisting the Headteacher in preparation and monitoring of the school's budgetary provision to ensure proper accounting of all school finances.</p> <p>Prepare budgets, with Financial Adviser advice, within timetable for final approval.</p> <p>Advice on budget position and budget preparation, having an oversight of all accounts, reporting difficulties to Headteacher and/or chairman of governors' Finance Committee.</p> <p>Ensure adequate arrangements for the safe collection, accounting and banking of all monies in accordance with approved regulations.</p> <p>Ensure ordering of goods and supplies and approval of invoices for payment within agreed regulations. Monitor quality of purchases. Seek out new suppliers if necessary.</p> <p>Develop and maintain effective financial administration systems in order to provide an efficient support service to all budget holders in school</p>

		<p>Administer and process all orders and invoices using the school systems</p> <p>Process all income using the appropriate method eg Paymant4Schools, to record income for wraparound and Pre School, school visits etc and E5 for invoiced and non-invoiced income</p> <p>Maintain accurate records and ensure financial procedures are followed</p> <p>Administer, control and Management of School Fund and associated bank accounts ensuring audit carried out at year end and report presented to Governors</p> <p>Manage the Imprest account ensuring that transactions are processed promptly</p> <p>Monitor payroll information, checking for accuracy and ensuring compliance with pay policy.</p> <p>Maintain, operate and review efficient administrative support systems in accordance with approved criteria and resources to meet the needs of the school.</p> <p>Assist in the operation of administrative support systems in accordance with approved criteria and resources to meet the needs of the establishment.</p>
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Appendix D

Financial Limits of Delegated Authority

Finance and Premises Committee

The Finance and Premises Committee has powers to approve expenditure and/or virements up to the limit of £20,000. The Finance and Premises Committee is NOT empowered to authorise expenditure that would place the school in an overspent position.

Personnel Committee

Full powers are delegated to the Personnel Committee to approve appointments, salary increases. up to the limit of the approved staff salaries budget. The Personnel Committee is NOT empowered to authorise expenditure that would place the staffing budget in an overspent position.

Finance and Premises Committee

Full powers are delegated to the Finance and Premises Committee to authorise expenditure up to the limits of the approved revenue and capital budgets. Finance and Premises Committee is not empowered to exceed these budgets (see virement below).

The Headteacher

The Headteacher is empowered to authorise expenditure only within the approved budgets, not including the contingency sum and up to a single value item not exceeding £5000. Approval of the appropriate committee or full Governing Body is required above this sum and for virement from the contingency sum.

Where specific items or work have the approval of the Governing Body, the Finance Committee or the Finance and Premises Committee, the Headteacher is empowered to authorise expenditure up to the approved sum. The approved sum is the amount allocated for the item or the lowest of any quotations/tenders less any contingency sums, whichever is the lower.

The Headteacher may delegate her authority to a named senior member of staff. This should be approved by the Governing Body and the decision recorded in the Governing Body minutes.

Budget Virement

The Headteacher is empowered to authorise virement between budget headings within the overall delegated sum as follows: -

- Up to £5,000 Discussed with relevant Committee Chairman. Subsequently reported to Finance and Premises Committee.
- From £5,000 to £20,000 Finance and Premises Committee approval required in advance and reported to Governing Body.
- Over £20,000 Governing Body approval required in advance.

Virement from capital to revenue is not allowed.

Procurement

Competitive quotations must be obtained wherever possible in accordance with the Tendering procedure (and based on Annex L to Worcestershire County Council Procurement Code²⁶ and LA guidance) as follows: -

- up to £5,000
Up to 3 quotations should be obtained. Quotations may be sought verbally but must be confirmed by suppliers in writing (email is acceptable). Catalogue prices may be used.
- £5,000- £20,000
At least 3 written quotations (email is acceptable) must be obtained based on a specification that succinctly describes the requirement but is not geared to a particular product or service offering. All quotations must be retained.*
- £20,000 – £50,000

²⁶³⁰ The Procurement code for Worcestershire County Council is available on WCC's website @ www.worcestershire.gov.uk/tendering.

At least 4 formal invitation to tenders or written quotations must be obtained based on a specifications that succinctly describes the requirement but is not geared to a particular product or service offering. All quotations must be retained.*

- £50,000 – Council Threshold. £213,477,
Minimum of 4 formal invitation to tenders to be obtained and retained.*.
- More than the Council Threshold. £213,477
Purchasing is strictly in accordance with the current Council’s Procurement Code. Invitation to tender opportunities must be advertised on the UK’s Find a Tender service portal.

* Unsuccessful tenders/quotes are retained for a minimum of one year following completion of the contract. Successful tenders/quotes and supporting documentation showing the decision-making process are retained for six years following completion of the contract.

Contracts

Variations to contracts and/or specifications involving additional expenditure exceeding £100 whether or not from the contingency sum require the approval of the appropriate Committee or in an emergency the Chair of the appropriate Committee.

Writing off of Debts

The Headteacher may authorise write-off up to a limit of £50.

Chair of Governors may authorise write-off up to a limit of £100.

Finance and Premises Committee may authorise write-off of debts of £101 - £250.

WCC procedures apply for all debts above £250 to be written off. In such cases, the Finance Committee will recommend write off but must notify Financial Services who have authority to approve that the debt is written off.

Petty Cash

Petty cash is not held at Fladbury First School

Appendix E

Reporting Requirements for Governors and Local Authority

For Governors

	Information	Frequency	Deadline
1	Actual Budget allocations from the LA	Annual	With (7)
2	Additional funds from LA throughout the year	As appropriate	
3	Devolved Capital formula allocations from the LA/ DfE	Annual	With (7)
4	Other allocations and grant claims	As appropriate	
5	CFR report	Annual	September
6	Budget Plan for approval	Annual	In time to forward to LA by 1 st May

7	Budget monitoring statement for public funds from school's finance system showing original budget, latest revised budget, commitments, actual £ and % received/spent to date, balance outstanding and end of year projections	Termly	
9	Capital spend each term	Termly	
10	Forward projections (3 years)	Annual	
11	Private funds – approval of annual audited accounts	Annual	Audit to take place within three months of Year end. Approval of audited accounts within 6 months of year end
12	Financial Benchmarking ²⁷	Annual	
13	Completion of SFVS self-assessment	Annual	Returned annually By 31 st March
14	PCI DSS compliance return to LA	Annual	

For Local Authority

	Information	Frequency	Deadline
1	Budget Plan	Annual	1 st May
2	Lease Assessment Form	Annual	30 th September
3	Management of Surplus Balances Pro-Forma	On request	This information may be requested by the Local Authority where a school's uncommitted surplus balance exceeds the limit for the school phase.

Appendix F Procurement Policy

Introduction

The essence of good financial control in purchasing and contracting is twofold. Firstly, to ensure that value for money is obtained and secondly to minimise the opportunity for fraud.

It is fundamental that competitive prices/quotations/tenders are obtained on a like for like basis, whether the invitation is for goods or services. It is therefore essential to invite quotations/tenders against a carefully drawn up specification. Where the value of the

²⁷³¹ Further guidance on financial benchmarking is available from the DfE Schools Financial Benchmarking website. The Schools Finance Team will publish benchmarking information for Worcestershire schools based on Consistent Financial Reporting data for maintained schools. This is available for the Schools Finance Team 01905 844009

work/services exceeds £5,000 this must always be the case. Specifications must be prepared by persons properly qualified and experienced to do so.

To minimise the opportunity for fraud and to protect the interests of staff it is fundamental to separate the functions of ordering and receipt/authorisation of payment.

Tendering and Quotation Procedure

This procedure is intended to ensure that tenders and quotations obtained by the school are invited and processed in accordance with the standing orders of the School, LA, and all legal requirements. It is intended as far as possible to separate the functions of invitation and selection and protect staff involved.

This procedure covers ALL contracts to be entered into by the school, including annual maintenance contracts.

The headteacher will make sure that all tenders and quotations have the following guidance considered and followed, and if not, using all appropriate steps will share this with the full governing body before rejecting any step of the process or requirements.

- EU procurement directives and the UK regulation ([EU procurement directives and the UK regulations – GOV.UK \(www.gov.uk\)](http://www.gov.uk))
- Buying procedures and procurement law for schools ([Buying procedures and procurement law for schools – Buying things that are over the procurement threshold – Guidance – GOV.UK \(www.gov.uk\)](http://www.gov.uk))

These steps should consist of but are not limited to the below:

- assess the market.
- see if you can procure what you need using a DfE recommended framework tool or another framework agreement ([Benefits of using a framework – Find a DfE approved framework for your school – GOV.UK \(find-dfe-approved-framework.service.gov.uk\)](http://www.gov.uk))
- prepare your contract and invitation to tender.
- consider whether to use the restricted procedure to reduce the number of bids you have to assess later, or open the procedure to let anyone bid.

Then you must:

- advertise a contract notice using the UK e-notification service, Find a Tender (FTS) ([Find high value contracts in the public sector - GOV.UK \(www.gov.uk\)](http://www.gov.uk)).
- make your invitation to tender and all other documents available electronically from the time that the contract notice is published.
- assess all the bids you get fairly, using the same process.
- choose the supplier that offers best value for money.
- award the contract to the highest scoring bid supplier.

Number of Quotations

For the supply of goods or services:-

- Below £5,000 An appropriate number of quotations should be obtained. Quotations may be sought verbally but must be confirmed by suppliers in writing (email is acceptable). Catalogue prices may be used.
- More than £5,000 and less than £20,000 At least 3 written quotations (email is acceptable) must be obtained based on a specification that succinctly describes the requirement but is not geared to a particular product or service offering. All quotations must be retained*, and signed off by the headteacher.
- More than £20,000 and less than £50,000. At least 4 formal invitation to tenders or written quotations must be obtained based on a specification that succinctly describes the requirement but is not geared to a particular product or service offering. All quotations must be retained*, and signed off by the headteacher and agreed with an appropriate Governor and recorded.
- More than £50,000, you must run your own buying process, inviting suppliers to submit bids if:
 - you cannot get what you need through a framework agreement.
 - you are buying high-value things
 - appropriate Governor agreement and recorded within the minutes of the meeting.
- More than £213,477 you must run a Public Contracts Regulations (PCR) compliant buying process.
 - appropriate Governor agreement and recorded within the minutes of the meeting.

* Unsuccessful tenders/quotes must be retained for a minimum of one year following completion of the contract. Successful tenders/quotes and supporting documentation showing the decision-making process are retained for six years following completion of the contract.

Emergency Works

Competition may be waived where Contractors need to be engaged, or materials purchased to carry out immediate remedial works in an emergency. Any action taken must be reported to Governors at the earliest opportunity.

Contractors Own Conditions

In cases where a Contract is let using the Contractor's own conditions, typically accepting a quotation, the Responsible Officer (Headteacher or Governing body) MUST satisfy him/herself that the Conditions are acceptable and do not disfavour the school.

Payment

Payment will be made when the work or supply is satisfactorily complete.

Contractors usually make an “interim claim”. It is, however, the Contract Administrator’s responsibility to value the work. Interim Certificates must be issued in accordance with the Contract Conditions.

Where the Contract includes a lump sum payment this must only be made when the work is properly completed, and proper final account rendered.

In all cases no payments are to be made in advance.

Records

All records should be kept for the appropriate retention period, and will need to be made available to appropriate officers of the Local Authority or their agents, which will include but not limited to internal audit, external audit, property services, procurement, finance.

- The school must keep an updated list of contracts and the values of all these contracts. A template is available from Worcestershire Children First Schools Finance Team SharePoint site.
- The school should keep a record of conflict or interest record for anyone involved within any Tender/Quotation. A template is available from Worcestershire Children First Schools Finance Team SharePoint site.
- A copy of any quotations and the specification of requirements sent out to receive these quotations. A template of a quick quotes template is available from Worcestershire Children First Schools Finance Team SharePoint site.
- Terms of reference for evaluation of quotations and tenders where appropriate. A template is available from Worcestershire Children First Schools Finance Team SharePoint site.

NOTES

Please note that where reference is made to documents on the FMSIS website, these are now accessible from the national archives via the following link:

<http://webarchive.nationalarchives.gov.uk/20110202132017/http://www.fmsis.info>