



Lambley Primary School



Finance Policy

**Schools Finance  
Environment & Resources Department  
Nottinghamshire County Council**

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## 1 INTRODUCTION

The Governing Body recognises the need for good financial control over the schools' resources and has formulated this policy in order to achieve the standards of financial management as outlined in Ofsted guidelines, the DfE and to ensure compliance with the Nottinghamshire Scheme for Financing Schools.

The key standards to be achieved are:

- The financial responsibilities of the Governing Body, its committees, the Headteacher and staff should be clearly defined and limits of delegated authority established.
- The budget should reflect the schools prioritised educational objectives as set out in the School Improvement / Development Plan, seek to achieve value for money and be subject to regular, effective monitoring.
- The school should establish sound internal financial controls to ensure the reliability and accuracy of its financial transactions.
- In accordance with section 2.6 of the LA Scheme for Financing Schools, the school should ensure that a professional internal audit of its financial arrangements takes place at a frequency determined by the Corporate Director, Environment & Resources and Corporate Director, Children, Families & Cultural Services and that adequate budget provision is made for this service.
- The school should ensure that purchasing arrangements achieve the principles of best value.
- All income due to the school should be identified and collected. All collections should be receipted, recorded and banked promptly.
- The school should properly control the operation of bank accounts and reconcile bank balances with the accounting records.
- There should be efficient procedures in place for the administration of personnel matters, including payroll where applicable.
- The school should control the use of petty cash.
- The school should ensure that it complies with VAT and other applicable tax regulations.
- Stocks, stores and other assets should be recorded and adequately safeguarded against loss or theft.
- The school should be adequately insured against exposure to risks.
- The Governing Body and Headteacher should be satisfied that they are meeting the requirements of the 1998 Data Protection Act and any subsequent regulations and amendments.
- School voluntary funds should be administered as rigorously as public funds.

## 2 ORGANISATION OF RESPONSIBILITY & ACCOUNTABILITY

### 2.1 Full Governing Body

#### Membership as at 20/12/18

##### **Members:**

Diane Bathgate- Chair (Co)  
James Roys– Vice-Chair (P)  
Vicky Dilnot (HT)  
Lawrence Milbourn (LA)  
Luke Richardson (P)  
Liam Wiltshire (P)  
Claire Gavagan (Co)  
Mary Swan (Co)  
Claire Davis (Co)  
Catherine O’Hara (Co)  
Nigel Wildgust (Co),  
Rebecca Watson- Shardlow (St),  
VACANCY (Co) x 2,

##### **Quoracy: 7**

##### **Role:**

The Governing Body has a strategic role in determining the educational and financial priorities of the school, ensuring that the financial resources delegated to it are used effectively and that adequate internal controls are maintained over these. The Governing Body of **Lambley Primary School** has delegated the responsibilities as agreed in the School Governors’ Decision Planner as outlined below to its Finance committee.

All delegated decisions will comply with the Nottinghamshire Scheme for Financing Schools.

##### **Responsibilities:**

- To fulfil the statutory responsibility for the administration of financial management within the school.
- To set out in writing the roles and responsibilities of the Governing Body, its committees, the Headteacher and Office Manager in relation to financial decision making in a Finance Policy.
- To undertake an annual review of the Finance Policy.

- To undertake an annual review of the agreed roles and responsibilities by completing the School Governors' Decision Planner.
- To set up a Finance committee to consider strategic financial issues on behalf of the Governing Body, and to review the committee's remit and membership on an annual basis.
- To establish the financial limits of delegated authority to enter into commitments, to authorise invoices and the subsequent payment of these (e.g. cheques, BACS).
- To approve the financial procedures within the school and ensure that they comply with the Nottinghamshire Scheme for Financing Schools.
- To establish a register of business interests of governors, the Headteacher and any other staff who have the ability to influence financial decisions, to ensure that it is open to inspection and to oversee its maintenance through an annual review and/or update.
- To approve the annual Budget Plan and Best Value statement (as per section 2.4 of the Nottinghamshire Scheme for Financing Schools) and ensure that they are submitted to the LA by the required deadline.
- To approve the annual CFR governors' outturn statement and the proposed use of surplus balance in excess of recommended limits.
- To determine the level of detail, minimum frequency and general format of financial information to be provided to the Governing Body, especially in relation to budget monitoring reports.
- Review the completed mid-year reforecast return (to be submitted to Schools Finance by 30<sup>th</sup> November) and note impact of any changes to the projected carry-forward
- To ensure that the priorities, aims and objectives are outlined in the School Improvement / Development plan and are costed and clearly linked to the annual Budget Plan.
- To monitor expenditure and income by receiving regular reports from the Headteacher comparing expenditure to the original budget set, and report back to the full Governing Body.
- To approve virements at the level specified in the school's agreed financial procedures and in accordance with the levels of delegation agreed by the full Governing Body.
- To operate the Governing Body's arrangements for obtaining quotations and inviting tenders in accordance with section 2.10 of the Nottinghamshire Scheme for Financing Schools.
- To approve leasing arrangements after consultation with Schools Finance.

- To report suspected financial irregularities to the Corporate Director, Children, Families & Cultural Services without delay, and as necessary convene disciplinary panels to consider the findings of investigations.
- To respond promptly to any recommendations made in audit reports and monitor the progress of any remedial action identified.
- To ensure that the school is able to demonstrate compliance with the DfE Schools Financial Value Standard (SFVS) in line with the timetable determined by the DfE.
- To approve (and minute the approval of) the school's completed SFVS.
- To ensure the maintenance of the inventories and security of assets and to approve in writing the method of disposal and the deletion of items from the inventory.
- To ensure that the income from the sale of any assets is managed in line with section 5.4 of the Nottinghamshire Scheme for Financing Schools.
- To formulate and recommend to the Governing Body a charging and lettings policy in line with the LA policy.
- To formulate and recommend to the Governing Body a charging and remissions policy for activities.
- To determine arrangements regarding petty cash.
- To determine the arrangements for the school fund accounts, for the annual audit of these and approval of the annual audit certificate.
- To determine insurance arrangements.
- To determine matters relating to building maintenance, health and safety and lettings outside school hours in accordance with the Governors' delegated responsibilities.
- To report appropriate financial information to parents in a format approved by the Governing Body.

## **2.2 Finance Committee**

**Membership as 20/12/18**

**Chair: James Roys**

**Members: Catherine O'Hara, Lawrence Milbourn, James Roys, Vicky Dilnot, Rebecca Watson-Shardlow**

**Quoracy: 3**

**Role:**

The Governing Body of Lambley Primary School has delegated the responsibilities as agreed in the School Governors' Decision Planner as outlined below to its Finance committee.

All delegated decisions will comply with the Nottinghamshire Scheme for Financing Schools.

**Responsibilities:**

- To oversee the preparation of the school's annual budget plan and best value statement in accordance with the priorities within the school improvement plan (including the staff complement), for determination by the full Governing Body.
- To formulate the written description of financial systems and procedures and ensure that these comply with the Nottinghamshire Scheme for Financing Schools.
- To monitor expenditure and income by receiving regular reports from the Headteacher comparing expenditure to the original budget set, and report back to the full Governing Body.
- To approve virements at the level specified in the school's agreed financial procedures and in accordance with the levels of delegation agreed by the full Governing Body.
- To operate the Governing Body's arrangements for obtaining quotations and inviting tenders in accordance with section 2.10 of the Nottinghamshire Scheme for Financing Schools.
- To ensure the maintenance of the inventories and security of assets and to approve in writing the method of disposal and the deletion of items from the inventory.
- To ensure that the income from the sale of any assets is managed in line with section 5.4 of the Nottinghamshire Scheme for Financing Schools.
- To recommend to the Governing Body a charging policy in line with the LA policy.

- To determine arrangements regarding petty cash.
- To determine the arrangements for the school fund accounts, for the annual audit and approval of the annual certificate.
- To determine insurance arrangements.
- To determine matters relating to building maintenance, health and safety and lettings outside school hours in accordance with the Governors' delegated responsibilities.
- To report appropriate financial information to parents in a format approved by the Governing Body.

### **2.3 The Headteacher**

***Headteacher name as at 18.1.19: Vicky Dilnot***

**Role:**

To ensure that sound systems of internal control are in place and are implemented. To ensure that the financial administration of the school operates within the Nottinghamshire Scheme for Financing Schools. In the absence of the Headteacher, responsibilities outlined below will be delegated to the Deputy Headteacher.

**Deputy Headteacher name as at 18.1.19: Rebecca Watson-Shardlow**

**Responsibilities:**

- To prepare the annual budget plan for the Governing Body's approval.
- Ensure that the School Development Plan priorities are properly costed and clearly linked to the school's budget plan.
- To undertake budget monitoring exercises on a monthly basis.
- To monitor the cash flow.
- To provide reports to the Governing Body on a **termly** basis on the financial position of the school. These should be in a format approved by the Governing Body and report any variations in expenditure against the approved budget plan.
- To oversee the day to day management of the school's financial administration, ensure that sound systems of internal control exist over these and ensure that they comply with the Nottinghamshire Scheme for Financing Schools.
- To report suspected bank and/or cheque fraud to the Senior Finance Business Partner – Public Health and Schools.

- To consider and respond promptly to recommendations made in audit reports and advise the Governing Body of any remedial action to be implemented.
- To authorise orders, invoices and payments up to the limits agreed by the Governing Body as outlined in section 5 of this policy.
- Organisation of personnel in respect of financial administration, also ensuring that there are satisfactory contingency arrangements, particularly in the absence of key staff.
- To submit required returns to the Local Authority in line with published deadlines.
- To ensure that where budgets are delegated to a cost centre or departmental level that they operate within a similar control regime in respect of budget monitoring and reporting.

**Responsibilities:**

- To prepare the annual budget plan and best value statement for the Governing Body's approval.
- Ensure that the School Improvement / Development Plan priorities are properly costed and clearly linked to the school's budget plan.
- To undertake budget monitoring exercises on a monthly basis.
- To monitor the cash flow.
- To provide reports to the Governing Body on a termly basis on the financial position of the school. These should be in a format approved by the Governing Body and report any variations in expenditure against the approved budget plan.
- To oversee the day to day management of the school's financial administration, ensure that sound systems of internal control exist over these and ensure that they comply with the Nottinghamshire Scheme for Financing Schools.
- To report suspected bank and/or cheque fraud to the Service Manager – LA Finance Team (Schools).
- To consider and respond promptly to recommendations made in audit reports and advise the Governing Body of any remedial action to be implemented.
- To authorise orders, invoices and payments up to the limits agreed by the Governing Body as outlined in section 5 of this policy.
- Organisation of personnel in respect of financial administration, also ensuring that there are satisfactory contingency arrangements, particularly in the absence of key staff.

- To submit required returns to the Local Authority in line with published deadlines.
- To ensure that where budgets are delegated to a cost centre or departmental level that they operate within a similar control regime in respect of budget monitoring and reporting.

### **The Office Manager**

#### **Structure as at 18.1.19**

#### ***Mrs Yvette Newton (Office Manager Mon-Thurs)***

#### **Role:**

To implement the finance policy and procedures agreed by the Governing Body and Headteacher and to process financial transactions and activities in line with these. To maintain the school accounting system and to monitor the budget on a day to day basis.

#### **Responsibilities:**

- To undertake responsibility for the day to day administration of the schools' financial administration including:
  - Ordering goods
  - Authorising orders (up to limits of delegated authority)
  - Receiving goods
  - Processing invoices
  - Authorising invoices (up to limits of delegated authority)
  - Processing cheques to suppliers
  - Signing cheques (up to limits of delegated authority)
  - Payroll notifications and claims
  - Staffing returns
  - Monthly reconciliation of expenditure (pay and non-pay)
  - Banking of income
  - Maintenance of the petty cash account
  - Maintenance of the School Fund accounts (including receipts and payments)
- To provide monthly monitoring information for the Governing Body and Headteacher
- To submit returns required by the Local Authority by the prescribed deadlines as outlined in the LA Scheme for Financing Schools including the annual budget plan, best value statement, re-forecast return, surplus balance (B02) return, monthly VAT reports, monthly REC1s, quarterly bank statements and un-reconciled transaction listings.
- To monitor the cash flow position of the school and report to the Headteacher on a regular basis.

- To assist the Headteacher in the preparation of the annual budget plan and best value statement.
- To maintain the school accounts, reports and records in accordance with the Nottinghamshire Scheme for Financing Schools.
- To maintain the school fund accounts in accordance with the Internal Audit Service publication 'Managing School Funds', and to prepare the annual school fund audit certificate.

### **The Office Admin**

#### **Structure as at 18.1.19**

***Mrs C Aizlewood (Office Admin Fridays- term time only)***

#### **Role:**

To implement the finance policy and procedures agreed by the Governing Body and Headteacher and to process orders. To maintain the school inventory and to monitor this on a monthly basis.

#### **Responsibilities:**

- To undertake responsibility for the day to day administration of the schools' financial administration including:
  - Preparing orders
  - Receiving and processing orders
  - Undertaking cash collection duties for trips, curriculum activities and any fundraising
  - Banking of income
- To support the maintenance of inventories and returns to comply with statutory requirements.

### **2.5 Cost Centre Budget Holders**

*There are no cost centre budget holders at Lambley Primary School*

To undertake the effective and efficient management of and to remain accountable for, the resources delegated to them by the Governing Body / Headteacher.

#### **Responsibilities:**

- To undertake the day to day monitoring and control of budgets delegated to them.
- To ensure that any goods/services purchased from the delegated budget are done so in accordance with the schools financial management procedures and the Nottinghamshire Scheme for Financing Schools.

### **3 FINANCIAL PLANNING & BUDGET MONITORING**

- 3.1 The school has a written statement of its aims and objectives *in the form of the annual school profile\** and this forms the basis for constructing budget plans.
- 3.2 The school has both medium term educational (School Development) and budget plans which outline the areas of priority with regards to spending, showing how the use of resources is linked to the achievement of the school's goals.
- 3.3 The Governing Body has established a formal procedure for planning the School Improvement /Development plan and the budget and has set out a timetable for the process.
- 3.4 The Headteacher will prepare estimates of expenditure and income in good time for consideration and approval by the Governing Body within the time scale outlined in the budget planning timetable outlined in the Governing annual Planner.
- 3.5 The Governing Body will ensure that planned expenditure does not exceed the available budget allocation during budget reviews.
- 3.6 The Headteacher will forward details of the approved budget to the Governing Body for timely consideration and will also alert the Governing Body of any subsequent changes to the budget.
- 3.7 The Governing Body / Headteacher should report to the LA on the intended use of any balances as prescribed in Section 4 of the Nottinghamshire Scheme for Financing Schools by 31<sup>st</sup> May each year.
- 3.8 The Governing Body should ensure that the main elements of the school's budget are subject to a periodic review to ensure that the school works within the principles of Best Value and that historic spending patterns are not repeated without challenge.
- 3.9 The school operates a system of budget profiling and cash flow forecasting to take account of likely spending patterns and the Headteacher will ensure that this is made available to the Governing Body at all planned budget review meetings.
- 3.10 The Headteacher / Office Manager will provide a report on expenditure, including items committed but not yet paid, and reconciled against Local Authority records, at each budget review meeting as shown on the timetable in see above. This report should include details on any significant variances against the approved Budget Plan and where necessary any remedial action plans and monitor the expenditure on the initiatives set out in the School Development plan.
- 3.11 The Headteacher is authorised by the Governing Body to appoint a budget manager for any department as appropriate within the school and may delegate the responsibility to spend within a department's annual budget allocation to the department's appointed budget manager.
- 3.12 The Headteacher / Office Manager will provide department budget managers access to regular reports on spending and these will be reviewed with the Headteacher / Office Manager periodically or as deemed appropriate.

- 3.13 The Headteacher / Office Manager will ensure that the Governing Body is made aware of all virements made.
- 3.14 The Headteacher and the Governing Body will assess the progress made against the stated objectives in the School Development plan according to the timetable given in the annual planner.
- 3.15 The Headteacher will periodically consult the Governing Body and relevant staff to ensure that the financial and management information issued is relevant, timely, reliable and understandable. This review will be conducted at least annually.
- 3.16 The Headteacher will report any proposal for policy changes which significantly affect the expenditure or income budgets at the next Finance Committee meeting.
- 3.17 The Headteacher will ensure that the capital expenditure limits as set by the LA are not exceeded without written approval from the LA.
- 3.18 Where written approval is sought by the Headteacher to place a high value order or enter into a contract, the Governing Body will be informed of the amount and reason for the expenditure.

#### **INTERNAL FINANCIAL CONTROLS**

- 4.1 The Governing Body will ensure that there are written descriptions of all the school financial systems and procedures. These should be kept up to date and all relevant staff trained in their use.
- 4.2 The Headteacher will ensure that appropriate cover is available in the absence of key personnel to ensure that financial control is maintained.
- 4.3 The Headteacher will ensure that as far as possible the duties of staff relating to financial administration are distributed so that at least two people are involved. The work of one person should act as a check on the work of the other. All checks should be fully documented.
- 4.4 The Headteacher will ensure that proper accounting records are maintained and held securely. Financial documents will be retained in accordance with Annex A of the Nottinghamshire Scheme for Financing Schools.
- 4.5 An audit trail of all financial transactions will be maintained from original documentation to the accounting records, and vice versa.
- 4.6 Alterations to documents will be made clearly in permanent ink, initialled and dated. The use of correction fluids or erasure of information is not permitted.
- 4.7 Accounting records will be properly and securely maintained and access to these will only be permitted to authorised staff. The Headteacher will determine who is authorised to access the records.
- 4.8 The Headteacher will ensure that expenditure from ring fenced sources of funding are used for their intended purposes and are identifiable within the school accounts and supporting records.

- 4.9 The Governing Body should ensure that a professional internal audit takes place on the financial arrangements of the school at least every **5 years**. Schools will be notified by NCC Internal Audit Services in January if they are scheduled for an audit in the next financial year.
- 4.8 The internal audit provider selected must be CCAB qualified, have all relevant insurances and professional indemnities and carry out their work in compliance with the Public Sector Internal Audit Standards.
- 4.9 Where a provider other than NCC Internal Audit Services is chosen, the details of the organisation selected must be notified to the Head of Internal Audit. A copy of the final audit report and the school's responses to the recommendations made must also be forwarded to NCC Internal Audit Services within four weeks of receiving the report.

## **PURCHASING**

- 5.1 Before any orders are placed, the person responsible for placing the order will ensure that the school is—achieving value for money. Consideration will be given to price, quality and fitness for purpose.
- 5.2 The financial limits of delegated authority as approved by the Governing Body for entering into commitments and ordering goods and services are as detailed below:-

***Enter your financial limits of delegated authority here or attach as an appendix to the Finance Policy. As a guide, in a primary schools a realistic limit for a Headteacher is £5,000 (below this amount there is no requirement to obtain 3 quotes). Other staff should be below this amount e.g. Deputy Head £2,500, Office Manager £1,000 etc.***

<b>Headteacher</b>	<b>£5,000</b>
<b>Deputy Headteacher</b>	<b>£5,000</b>
<b>Office Manager</b>	<b>£1000</b>

- 5.3 Expenditure above the Headteacher's delegated authority, but below £25,000 must be approved by the Finance committee or Full Governing Body and formally recorded in the minutes of the meeting.
- 5.4 All orders must be signed by an authorised member of staff per the list in section 5.2 subject to their authorised delegated level other than where the expenditure has been approved by Governors and their approval formally recorded in the minutes. The signatory should be satisfied that the goods or services ordered are appropriate and necessary, that there is adequate budgetary provision and that quotation / tendering procedures have been followed.
- 5.5 All intended purchases with an estimated value of £25,000 or more must be awarded by one of the following methods open competitive tendering by an advertisement in at least one local newspaper and an appropriate trade journal;
- selective tendering from at least three recognised sources known to be suppliers of the goods and/or and services in question;
  - such other arrangements made with the prior written approval of the Assistant Chief Executive and the Corporate Director, Environment & Resources.

- 5.6 All intended purchases or contracts for supplies and services with an estimated value above £156,442 (determined as at 31<sup>st</sup> January 2010) or more must observe European Union law and must be advertised in the Official Journal of the European Union. Advice should be obtained from the Assistant Chief Executive in order that the relevant European Directives are complied with.
- 5.7 Purchases or contracts with an estimated value of between £5,000 and £25,000 can be awarded by one of the methods described above or by inviting at least 3 alternative written offers or quotations. In circumstances where obtaining 3 quotations is impractical the reasons for not following these procedures must be reported to the Governing Body and recorded in the minutes of the meeting.
- 5.8 For purchases of less than £5,000, the Governing Body will make the most suitable arrangements for the ordering works, goods and services or disposal of equipment and goods but will obtain alternative offers or quotations wherever possible.
- 5.9 All contracts, orders and purchases with an estimated value of £25,000 or more will be subject to a decision of the full Governing Body and recorded in the minutes of the meeting.
- 5.10 The Governing Body will be informed of all instances where a quotation has been accepted that is not the lowest or most financially advantageous option available. This will be recorded in the minutes of the meeting.
- 5.11 The purchasing of works, goods or services can be entered into without the tendering or quotation procedures described above if the order or contract is placed with a department of the County Council.
- 5.12 Official prior pre-numbered orders must be raised for all works, goods and services (with the exception of utilities, rents, rates and petty cash payments). Where urgency requires a telephone order, this should be subject to the procedures outlined above and an official order raised at the earliest opportunity as confirmation to commit the expenditure, and to ensure financial commitments are recorded.
- 5.13 Where orders are sent by fax, both sides must be faxed to the supplier as the standard NCC conditions of order are printed on the reverse of the order form.
- 5.14 When an order is placed, the value should be committed against the appropriate budget heading on the schools financial system so that it is included in budget monitoring reports.
- 5.15 Official orders will only be used for goods and services provided to the school. Individuals are not permitted to use official orders to obtain goods or services for their private use.
- 5.16 The Office Admin will ensure that goods and services are checked on receipt to ensure that they match the order. Wherever possible, the person responsible for checking the goods or services is not the person who orders the goods and processed the invoice. The checking procedure should be recorded on the order / delivery note and passed to the person responsible for processing invoices.
- 5.17 The Office Manager will ensure that payments are only made to a supplier once the goods or services have been received and checked and confirmed as being satisfactory, and on receipt of a proper invoice which has been received, checked, coded and certified for payment.

- 5.18 The limits of delegated authority as approved by the Governing Body for authorising invoices for payment are as detailed below. There is no limit set for the Headteacher as control over the level of authorisation has already been applied in the ordering process as identified in section 5.2 and 5.3

***Enter your financial limits of delegated authority here or attach as an appendix to the Finance Policy.***

<b><i>Headteacher</i></b>	<b><i>£ unlimited (see 5.2 and 5.3)</i></b>
<b><i>Deputy Headteacher</i></b>	<b><i>£5,000</i></b>
<b><i>Office Manager</i></b>	<b><i>£1,000</i></b>

- 5.19 Wherever possible, the authorisation of an invoice should not be performed by a person if they have also authorised the order and checked the receipt of goods or services.
- 5.20 All cheques raised require two signatures and these must be employees of the school. As outlined in the school's bank mandate all cheques in excess of £5,000\* must be signed by the Headteacher. There is no limit set for the Headteacher as control over the level of authorisation has already been applied in the ordering process as identified in section 5.2 and 5.3. The financial limits of delegated authority as approved by the Governing Body for signing cheques are detailed below:-

***Enter your delegated financial limits of authority here or attach as an appendix to the Finance Policy.***

<b><i>e.g.</i></b>	<b><i>Headteacher</i></b>	<b><i>£ unlimited</i></b>
	<b><i>Deputy Headteacher</i></b>	<b><i>£ unlimited</i></b>
	<b><i>Office Manager</i></b>	<b><i>£1,000</i></b>
	<b><i>Office Administrator</i></b>	<b><i>£1,000</i></b>

***Ensure that the cheque signatories detailed above agree with those detailed on your current bank mandate.***

## **5 INCOME**

- 6.1 The Governing Body will determine the charging policy for lettings and the supply of other goods and services. This will determine the rates of hire in place and will be reviewed on an annual basis.
- 6.2 All lettings will be authorised by Headteacher in accordance with the charging policy agreed by the Governing Body. Proper records should be kept of all lettings and the income due from these.
- 6.3 The Headteacher is responsible for ensuring that the responsibility for identifying sums due to the school is separated from the responsibility for collecting and banking such sums.
- 6.4 Invoices will be issued promptly by the Office Manager following the delivery of the service. This period of time will not exceed 30 days. Wherever possible, income should be collected in advance of the letting or service taking place.

- 6.5 Official, pre-numbered receipts will be issued for all income collected from external sources by the Office Manager. These will be traceable to the record of the banking.
- 6.6 All receipts and other records of income will be securely retained.
- 6.7 All cash and cheques will be held securely to safeguard against loss or theft. The amount of money held at any one time will not exceed the amount covered by the schools insurance policy.
- 6.8 All monies will be paid into the relevant bank account Notts County Council Lambley Primary School promptly and in full. Where a school closure period exceeds 24 hours, all significant income should be banked prior to this.
- 6.9 The Governing Body does not permit the encashment of personal cheques from income collections or the use of income collections to make payments.
- 6.10 The Office Manager is responsible for ensuring that monthly reconciliation takes place between the income collected and the sums deposited at the bank. This reconciliation should be fully documented and available for inspection when required.
- 6.11 Debts will be written off in accordance with section 2.1.6 of the Nottinghamshire Scheme for Financing Schools. The Governing Body will be informed of any such debts prior to them being written off. A record of any sums written off will be maintained.
- 6.12 The Headteacher will ensure that any transfers of money between staff are recorded and signed for.
- 6.13 Wherever possible, monies from vending and other machines should be emptied and the cash counted by two people.

#### **BANKING ARRANGEMENTS**

- 7.1 The Headteacher will ensure on behalf of the Governing Body that the operation of the school bank account (including the use of direct debits and debit / credit cards) is in accordance with section 3 – ‘Instalments of budget share; banking arrangements’ and Annex E – ‘Local Bank Account Scheme Regulations’ of the Nottinghamshire Scheme for Financing Schools.
- 7.2 The Headteacher will ensure that appropriate steps are taken to reduce the risk of bank / cheque fraud occurring or minimise the potential loss if this has already occurred in line with the guidance produced by the CFCS Finance team on Wired (Wired Communities/ CFCS Finance/Document Library/Schools/ Bank Account Scheme/Other).
- 7.3 The Office Manager will ensure that bank statements are obtained on at least a monthly basis and reconciled against the school financial system and relevant accounting records. Bank reconciliations will be signed as evidence of completion.
- 7.4 The Headteacher or nominated person will certify the monthly bank reconciliation and countersign the relevant reports as evidence that the checks have taken place.

- 7.5 Where possible, the person responsible for undertaking the bank reconciliation will not be responsible for the processing of receipts or payments.
- 7.6 Supporting vouchers will be made available to cheque signatories to safeguard against inappropriate expenditure.
- 7.7 Only manuscript signatures are to be used (i.e. not stamps or facsimile) and cheques should not be pre-signed.
- 7.8 Chequebooks will be held securely when not in use.
- 7.9 The Headteacher will maintain a list of all bank and building society accounts held by the school and a list of authorised signatories for each of these.
- 7.10 The Office Manager will ensure that the school's cash flow is regularly monitored to ensure that the account does not become overdrawn.

**Debit / Credit Card Usage**

- 7.11 **The school has no debit or credit cards. The school does have an IKEA Business account and B&Q Business Account.**
- 7.12 Card(s) will not be used for the withdrawal of cash through any ATM or cash back facilities. In exceptional circumstances cash may be withdrawn with **prior** approval of the Headteacher. The IKEA and B&Q Business accounts will only be used with the prior approval of the Headteacher with an order being raised and agreed ahead of any purchases. The school invoice payment procedures will then be followed.
- 7.13 The authorised users of the card(s) and their financial limits of delegated authority (including monthly spend restrictions) are outlined below:-

<b>Headteacher</b>	<b>£5000</b>
<b>Deputy Headteacher</b>	<b>£1000</b>
<b>Site Manager</b>	<b>£200</b>
<b>Office Manager (Card Manager)</b>	<b>£0</b>

- 7.14 The issue and control of the card(s) is managed independently by the **Office Manager** who is not a card signatory and hereafter referred to as the Card Manager. Cardholder(s) have been issued with associated notes of guidance, have signed to acknowledge receipt of the card and acceptance of the conditions of use and signed the card.
- 7.15 All debit / credit cards are held securely when not in use either by the cardholder or within the school in a secure location where there is limited access.
- 7.16 Any misuse of the card(s) outside of the conditions of use will result in the immediate withdrawal of the card(s) from the cardholder(s). The Headteacher will take appropriate action in line with the County Council's financial regulations.
- 7.17 The loss of any card(s) will immediately be reported to the bank and Card Manager.

- 7.18 If the card(s) are no longer required or the cardholder(s) leave the school they shall be returned to the Card Manager and destroyed in accordance with accepted procedures.
- 7.19 School debit / credit cards must not be used for personal purchases.
- 7.20 The use of school debit / credit cards for ordering goods and services shall operate in conjunction with the principles of best value.
- 7.21 The debit / credit card(s) should not be used until confirmation has been made with the relevant budget holder that there is budget available under the budget heading to cover the cost of the proposed expenditure. Confirmation should also be sought that there are sufficient balances in the bank account prior to the use of cards.
- 7.22 A record of expenditure incurred together with supporting vouchers or receipts should be maintained by the cardholder(s), including a valid VAT receipt where relevant. These should be submitted to the Budget Manager for the purpose of checking payments made.
- 7.23 Any credit card balances should be cleared in full either by cheque or approved direct debit by the due date. Debit card payments should be debited directly from the school bank account.

## **8 PERSONNEL AND PAYROLL**

- 8.1 The Governing Body has established procedures for the administration of personnel activities, including appointments, terminations and promotions following Nottinghamshire HR Policies. These are stored on 'Sharepoint' and can be made available from request from the school office.
- 8.2 The Headteacher will ensure that the duties of authorising appointments, making changes to conditions or terminating the employment of staff are separated from the duties of processing payroll notifications and claims wherever possible.
- 8.3 The Headteacher will ensure that all processes in relation to completing, checking and authorising any documents and claims related to appointments, terminations of employment and expenses are carried out by more than one person.
- 8.4 Details of staff able to authorise any documents and claims should be forwarded to the school's payroll bureau, including specimen signatures where required.
- 8.5 The Headteacher will ensure that personnel records are kept securely and only authorised personnel have access to them following GDPR Policies and procedures (see relevant documents available from the school office or on the school website).
- 8.6 All payments to individuals should be made through the payroll system except where an employment self-assessment questionnaire has been completed and the Headteacher is satisfied from reading the guidance that the contract is one of self-employment.
- 8.7 The Headteacher will maintain a list of all staff employed at the school. This will be updated on an annual basis to reflect new starters and leavers.

- 8.8 The Headteacher will ensure that regular payroll checks are carried out on payroll transactions against the schools documentation on staffing and pay to ensure they match.

### **PETTY CASH**

- 9.1 A petty cash account of £100 will be held. This will be held securely and only staff authorised by the Headteacher will have access to it.
- 9.2 Payments from the petty cash account will be operated on the Imprest principle, reimbursed to the predetermined limit on a monthly basis in line with the expenditure incurred during the previous month.
- 9.3 Payments from the petty cash account will be limited to minor items of expenditure. These will be supported by receipted invoices or vouchers, identifying any VAT paid, which must be separately accounted for.
- 9.4 Proper records will be kept of all reimbursements paid into and expenditure paid out of the petty cash account.
- 9.5 Personal cheques must not be cashed from the petty cash account.
- 9.6 Petty cash accounts will be reconciled to the bank account on a regular basis (not less frequently than monthly).
- 9.7 Reconciliations on the account will be subject to review by an independent person.

## **10 VAT AND TAXATION**

The Headteacher will ensure that all staff involved in the financial administration procedures within the school are aware of the current VAT and income tax regulations in accordance with section 7 of the Nottinghamshire Scheme for Financing Schools.

## **11 SECURITY OF ASSETS, STOCK AND OTHER PROPERTY**

- 11.1 The Headteacher is responsible for ensuring that assets, stock, cash and other property belonging to the school is kept in safe custody.
- 11.2 The Headteacher will ensure that stock levels are maintained in such a way to ensure continuity and availability of materials; maximum efficiency of annual budgets; good condition of stock and efficient use of storage capacity. Independent physical checks should be made of significant stocks no less than annually against stock records.
- 11.3 The Headteacher will ensure that an inventory is maintained of all portable, desirable, valuable and uniquely identifiable items. This will include details of serial numbers, make and model where applicable. All such items will be security marked as being the property of the school.

- 11.4 An annual check of the inventories against items physically held will be undertaken by an independent person and documented. All discrepancies identified on this check will be investigated reported to the Governing Body.
- 11.5 Where school property is loaned to staff or pupils and taken off site it will be recorded in a loans of equipment register. This will include the date of the loan, return and signature of the person borrowing the equipment. Any such loans should be authorised by the Headteacher.
- 11.6 If stocks or equipment are surplus, obsolete, damaged, not traceable or stolen, the governing body will authorise the write-off and sale or disposal in accordance with section 2.1.4 of the Nottinghamshire Scheme for Financing Schools.
- 11.7 Safes and secure cupboards/cabinets will be kept locked, the keys removed and held in a secure location as determined by the Headteacher.

## **12 INSURANCE**

- 12.1 The Governing Body will ensure that adequate insurance is taken out to cover risks to which the school is exposed. The school currently places its insurance arrangements with the County Council. An annual review of all risks will be conducted to ensure that an appropriate level of cover is maintained.
- 12.2 The Governing Body will review all risks not covered by the County Council on an annual basis and determine whether additional cover should be taken out.
- 12.3 The Headteacher will ensure that the Corporate Director, Environment & Resources is notified of all new risks, additions and alterations which require insurance or affect the school's existing insurance arrangements.
- 12.4 No indemnity will be given to any third party without the written consent of the Corporate Director, Environment & Resources.
- 12.5 The Headteacher will insure that the Corporate Director, Environment & Resources is immediately informed of any accident, loss or other incident that may give rise to an insurance claim.
- 12.6 The Governing Body will ensure that the insurance cover purchased covers the use of school property whilst off school premises.

## **13 DATA SECURITY**

- 13.1 The Governing Body will ensure that the school is registered in accordance with the Data Protection Act 1998. The use of any systems to record or process information will comply with this legislation. Additionally, they will ensure that security measures are in place to ensure the security of data and these measures are set out in the GDPR Policy and Procedures (See Appendix 1)

- 13.3 The Headteacher is responsible for ensuring that data is regularly backed up.
- 13.3 The Headteacher will ensure that the computer systems used for school management are password protected, documents containing personal or sensitive data are encrypted and that only authorised staff have access to the systems. These documents are only stored on school equipment or in the secure 'Sharepoint' area of Office 365 where they are password protected. Passwords should not be disclosed, should be changed regularly and updated for staff changes.
- 13.4 The Headteacher will ensure that adequate protection is in place to safeguard school systems and data against computer viruses. Only authorised software will be used.

#### **14 SCHOOL AND OTHER PRIVATE FUNDS**

- 14.1 The Headteacher will ensure that voluntary funds are accounted for separately from the school's delegated budget and are held in a separate bank account.
- 14.2 The Headteacher, on behalf of the Governing Body, will ensure that the accounting procedures for any voluntary funds reflect the same standard as those required for accounting for the school's delegated budget.
- 14.3 Any voluntary accounts will be subject to an annual audit by NCC Internal Audit Services or a suitable qualified or experienced independent auditor. The audit report will be presented to the Governing Body for their formal approval and recorded in the minutes of the meeting. A copy of the annual school fund audit certificate, signed by the Headteacher and the honorary Auditor should be forwarded onto NCC Internal Audit Services.

#### **Document Control**

<b>Version:</b>	<b>2013 Policy document (most up to date) from LA Finance</b>
<b>Date approved:</b>	<b>December 2018</b>
<b>Approved by:</b>	<b>Finance Committee</b>
<b>Next review:</b>	<b>December 2019</b>

# **Appendix 1- Description of Security Measures employed to safeguard the processing of Personal Data**

## **1. Organisational**

### **a. Policies & Documented Procedures**

Policies relating to information governance issues are drafted by employees with detailed knowledge of legal requirements and the Organisation's processes. All policies have documented review dates and ownership is assigned. Reviews are held ahead of the expiry date or sooner where there is an identified issue. All policies follow a governance route for approval. Key policies are published to the organisation's website for transparency.

### **b. Roles**

The organisation has a named Data Protection Officer who is **Sharon Johnson (20.12.18)**. This Officer executes the role by reporting the outcome of statutory process the Head Teacher who acts as the organisation's Senior Information Risk Owner.

### **c. Training**

The organisation regularly reviews our employee roles to ensure that training and awareness messages are appropriate to the nature and sensitivity of the data processing undertaken. Induction processes ensure new employees receive appropriate training before accessing personal data, and all other employees receive refresher training annually. All training received is documented for evidence purposes.

### **d. Risk Management & Privacy by Design**

The organisation identifies information compliance risks on its risk register. Risks are assigned clear ownership, rated against a consistent schema, appropriate mitigations are identified and are annually reviewed.

### **e. Contractual Controls**

All Data Processors handling personal data on behalf of the organisations have given assurances about the compliance of their processes; either through procurement assurances/ evidence, contractual agreement controls, risk assessments or supplementary statements.

### **f. Physical Security**

All employees or contractors who have access to our premises where personal data is processed are provided with Identity Cards which validate their entitlement to access. The organisation operates processes which ensure only those individuals who have an entitlement to access premises are able to. Access to physical storage holding sensitive personal data is further restricted either through lockable equipment with key or code control procedures or through auditable access to specific rooms/ areas of buildings.

## **g. Security Incident Management**

The organisation maintains a security incident process which, with the support of appropriate training, defines what constitutes a breach of these security measures to facilitate reporting of incidents. The process covers investigation of incidents, risk rating and decisions over whether to notify an incident to the Information Commissioner's Office (ICO) within the statutory timescale. Incidents are reported to senior leaders and actions are consistently taken and lessons learned implemented.

## **2. Technical**

### **a. Data at Rest**

#### **i. Use of Hosting Services**

Some personal data is processed externally to the organisation's managed environment by third parties in data centres under agreed terms and conditions which evidence appropriate security measures.

#### **ii. Firewalls**

Access to the Organisation's managed environment is protected by maintained firewalls. Business needs to provide access through the firewall go through a strictly documented change control process which include risk assessment and approval.

#### **iii. Administrator Rights**

Enhanced privileges associated with administrator accounts are strictly managed. Administrator activities are logged and auditable to ensure activity can be effectively monitored.

#### **iv. Access Controls**

Access permissions to personal data held on IT systems is managed through role based permissions. Managers of appropriate seniority inform IT professionals of additions, amendments and discontinuation of individual accounts within permission groups. Managers are periodically required to confirm that current permissions for which they are the authoriser and employees associated with these permissions are accurate.

#### **v. Password Management**

The organisation requires a mandatory password complexity combination of minimum length and characters, plus a required change of password after 90 days.

#### **vi. Anti-Malware & Patching**

The organisation has a documented change control process which facilitates the prompt implementation of any security updates provided by the suppliers of active software products.

## **vii. Disaster Recovery & Business Continuity**

As part of the organisation's business continuity plan, there is provision to ensure effective processes are in place to both safeguard personal data during a service outage incident and to re-establish secure access to the data to support data subject rights in ongoing service provision.

### **b. Data in Transit**

#### **i. Secure email**

The organisation has access to secure email software for communicating with some third parties where licensing agreements permit this. Sensitive data will be sent using such tools where available. Where software is not available a system of password protecting sensitive data in email attachments is employed.

#### **ii. Secure Websites**

The organisation has access to third party websites which allow for secure upload of personal data. The organisation uses these facilities to fulfil statutory obligations to report personal data to other public authorities.

#### **iii. Encrypted Hardware**

Devices which store or provide access to personal data are secured by password access. Removable media such as memory sticks are encrypted.

#### **iv. Hard-Copy Data**

The removal of personal data in hard-copy form is controlled by organisational policy which requires employees to take steps to conceal the data and appropriately secure the data during transport.

These security measures are reviewed annually and approved as accurate and appropriate by the organisation's governance process.