



# Finance Policy

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## 1. Introduction

The purpose of this Finance Policy is to help ensure The Prospect Trust operates with accountability and transparency, meeting the requirements of the Funding Agreement (FA), Academies Financial Handbook 2019 (AFH), Academies Accounts Direction (AAD), Companies Act 2006 and the appropriate Charities SORP.

This policy applies to all members, trustees, councillors, directors and staff of The Prospect Trust.

Any members of these groups involved with the financial management of the Trust should be familiar with the content of this policy, any related policies and procedures, the Academies Financial Handbook 2019 and the Academies Accounts Direction.

## 2. Roles and responsibilities

All members, trustees, directors, governors and staff must adhere to the 'seven principles of public life'. **Appendix A**

The specific roles and responsibilities of all groups of people/individuals who carry financial and assurance responsibilities within TPT are set out in the Trust Scheme of Delegation.

The DfE will be notified via ESFA online portal of any alterations to the personnel performing the roles of Member, Trustee, Local Governor, Chairs of trustees/local academic academy councils, accounting officer and chief financial officer.

### 3.1 Members

As a charitable company limited by guarantee, the Trust must have (at least three) members who have a similar role to the shareholders of a company limited by shares.

They:

- are the subscribers to the Trust's memorandum of association.
- may amend the articles of association.
- may appoint (and remove) members and trustees.
- appoint the Trust's auditors and receive the audited annual accounts.

If the Trust ceases to exist, they have a limited financial liability defined in the Memorandum and Articles of Association. Members' responsibilities and associated level of delegation are fully defined in the Trust Scheme of Delegation.

### 3.2 Trustees

The trustees are both charity trustees and company directors. They focus on:

- ensuring clarity of vision, ethos and strategic direction.
- holding executive leaders to account for the educational performance of the Trust and its learners, and the performance management of staff.
- overseeing and ensuring effective financial performance.

Trustees must ensure regularity and propriety in the use of the Trust's funds, and achieve economy, efficiency and effectiveness. The Board should identify the skills and experience that it needs and address any gaps through recruitment, and /or induction, training and other development activities.

Trustees responsibilities and associated level of delegation are fully defined in the Trust Scheme of Delegation.

### 3.3 Academy Quality Council

Each academy has an Academy Quality Council (AQC) which is appointed by the Trust Board. The AQC is responsible for holding principals to account for the academy's performance with a strong focus on learner achievement.

AQC councillor responsibilities and associated levels of delegation are full defined in the Trust Scheme of Delegation.

### **3.4 Accounting officer**

The accounting officer of The Prospect Trust serves as the chief executive, and is an ex-officio trustee.

The accounting officer has a personal responsibility to Parliament and the ESFA for the resources under the Trust's control. The accounting officer must assure Parliament, and the public, of high standards of probity in the management of public funds, particularly regularity, propriety and value for money.

The accounting officer must have appropriate oversight of financial transactions by:

- Ensuring that the Trust's property and assets are under the control of Trustees and measures exist to prevent losses or misuse.
- Ensuring bank accounts, financial systems and financial records are operated by more than one person.
- Keeping full and accurate accounting record to support the annual accounts.

The accounting officer must also demonstrate how the Trust has secured value for money via the governance statement in the audited accounts.

He will advise the Board in writing if, at any time, in his opinion, any action or policy under consideration by them is incompatible with the terms of the articles of association or the academies financial handbook. Where the Board is minded to proceed, despite the advice of the accounting officer, he must consider the reasons the Board gives for its decision. If, after considering those reasons his opinion is still that the action proposed by the Board is in breach, he must notify the ESFA immediately, and in writing.

### **3.5 Chief Finance Officer**

The CFO should play both a technical and leadership role, including ensuring sound and appropriate financial governance and risk management arrangements are in place, preparing and monitoring of budgets, and ensuring the delivery of annual accounts. The CFO should have the skills, knowledge, qualification and experience to contribute to the management of the Trust.

The CFO need not discharge all of his duties personally. The Trust can ensure its needs are adequately served by employing staff or contractors with the relevant skills and knowledge at the appropriate time.

### **3.6 Clerk to the Board**

The clerk to the Board must be someone other than a trustee, principal or chief executive of the Trust. The clerk provides:

- Administrative and organisational support.
- Guidance to the board in terms of compliance with the legal and regulatory framework.
- Advice on procedural matters relating to the operation of the Board.

### **3.7 All staff members**

All staff members across the Trust must be appropriately qualified and/or experienced and are responsible for:

- the security of academy property.
- avoiding loss or damage.
- ensuring economy and efficiency in the use of resources.
- conforming with the requirements of the Trust's financial policies and procedures.
- reporting any misuse of academy property or resources to their line manager.

## 4. Governance and financial oversight

The Board of Trustees has approved a written:

- scheme of delegation of financial powers that ensures appropriate separation of duties (Appendix B).
- internal control framework/financial procedures that support the maintenance of robust internal control arrangements and full and accurate accounting records.

### 4.1 Internal Control

The Trustees established a control framework that recognises public expectations about governance, standards and openness. The internal control framework includes:

- co-ordinating the planning and budgeting processes.
- applying discipline in financial management.
- preparation of monthly budget monitoring reports.
- ensuring that delegated financial authorities are respected.
- effective planning and oversight of any capital projects.
- the management and oversight of assets.
- the propriety and regularity of financial transactions.
- reducing the risk of fraud and theft.
- ensuring efficiency and value for money in the organisation's activities.
- a process for independent checking of financial controls, systems, transactions and risks.

### 4.2 Audit

The Trustees meet separately as a full board to review financial scrutiny and oversight and to provide assurance over the suitability of, and compliance with, its financial systems and operational controls. This takes into account the differing risks and complexity of its operations and provides assurance to the Board that risks are being adequately identified and managed by:

- reviewing the risks to internal financial control and,
- agreeing a programme of work to address, and provide assurance on those risks.

To support this, the Trust Board:

- employs suitably qualified finance consultants to carry out internal audits.
- plans a programme of works informed by the Risk Register.
- receives and scrutinise internal reports and the assurance of the completion of relevant priority recommendations.
- receives an adequate internal audit assurance letter.

### 4.3 Risk Management

The Trust has made a considered choice about its desired risk profile, taking account of its legal obligations, business objectives and public expectations. It has recognised and is managing present and future risks to ensure the effective and continued operation which are recorded in a risk register.

The Trust's procedures for the management of risk will include contingency and business continuity planning.

Where reasonable recommendations are made by risk auditors these will be addressed by the Trust.

#### **4.4. Whistleblowing, fraud and irregularities**

The Trust has a policy in place for whistleblowing highlighting to whom staff can report their concerns, and the way in which such concerns will be managed.

All suspected cases of fraud or irregularity will be followed up by the Trust or through auditors or even via the Police. All investigations will be managed in a confidential manner.

## 5. Financial Planning and monitoring

### 5.1 Budget monitoring

The Trust must prepare and monitor financial plans to ensure on-going financial health.

The Board must approve a balanced budget and any significant changes to that budget for the financial year to 31 August. This can draw on unspent funds brought forward. The Trustees will notify the ESFA within 14 days if it is formally proposing to set a deficit revenue budget for the current financial year, which it is unable to address, after unspent funds from previous years are taken into account.

The budget must be submitted to the ESFA annually in line with the ESFA timeline and following their template.

Budget forecasts must be compiled accurately, based on realistic assumptions, particularly on learner number projections.

The Trust must prepare management accounts every month setting out its financial performance and position. Management accounts must be shared with chair of the Board every month and with the wider Board at least six times a year. The Board must ensure that appropriate action is taken to maintain financial viability including addressing budget variances.

The Trust must manage its cash position robustly. It cannot go overdrawn, and the ESFA should be notified if the Board has concerns over liquidity.

### 5.2 Funding

The Trust operates a GAG pooling approach to form one central fund of ESFA funding.

This fund can be used to meet the normal running costs at any of its constituent academies. Pooled balances will also be used to cover the cost of the effective management of the Trust. However, specific capital funding (Condition Improvement Fund) must be allocated to the relevant academy.

Funding will be allocated to academies as set out in the annual budget approved by trustees.

If a principal considers their academy has been unfairly treated then they are to first raise this with the CEO, detailing their concerns in writing. Where a resolution has not been reached through the CEO, then the principal's concerns must be escalated to the Board for consideration. Only after the full board has approved the budget allocation, can the principal if they still feel their academy is being unfairly treated apply via the ESFA for the Secretary of State to intervene.

### 5.3 Reserves policy

The Trust's policy on reserves is:

- The Trust's in-year revenue income exceeds revenue expenditure (i.e. a balanced budget), so that general reserves are not depleted on normal operations.

- Reserves will be used primarily for capital investment across the Trust, where appropriate and on the basis of risk and need.
- Unrestricted and GAG restricted balance sheet reserves (excluding fixed asset and pension reserves) will exceed three per cent of annual turnover.

This policy may be adjusted at the time the budget is agreed depending on the existing financial conditions and subject to Board approval.

#### **5.4 Cash and investments**

The Trust Board may invest to further the Trust's charitable aims and objectives, but will ensure that investment risk is properly managed. The Board should ensure it has sufficient accessible cash to fund future capital investment needs.

The Trust is unable to borrow funds or overdrafts without Secretary of State approval so it is important it retains sufficient liquid assets.

The Trust will ensure that:

- Minimum cash levels in the current bank account are set.
- No more than £2.0m will be invested at any one time.
- No individual investment can exceed £300k.
- No investment will be made for more than a period of 12 months.
- Investments will be placed with AAA-rated organisations.
- Any investment needs the prior approval of the chief executive.
- Interest earned will be classified as Trust income.
- The Trust Board will monitor investment activities.

#### **5.6 Borrowing**

The Trust must seek the ESFA's prior approval for borrowing (including finance leases and overdraft facilities) from any source, where such borrowing is to be repaid from grant monies or secured on assets funded by grant monies, and regardless of the interest rate chargeable.

Credit cards can only be used for business (not personal) expenditure, purchase must be fully documented (receipts) and balances cleared before interest accrues.

#### **5.7 Retention of Finance and Payroll Records**

All records relating to the financial management of the Trust are retained as the per the Trust's Data Protection Policy in line with the General Data Protection Regulation (GDPR) and Data Protection Bill is based on the Data Protection Act 1998.

Specifically, all financial records are to be retained for six complete financial years plus the current financial year. Payroll and pension records are to be retained for a period of seven complete income tax years. Employers liability insurance certificates are to be retained for 40 years.

Individual departments are responsible for the retention and storage of their relevant documents which must be readily available for Trust, DPO and/or audit review.

## 5.8 Accounting methodology

The Trust prepares accruals accounts, giving a true and fair view of the use of resources, in accordance with existing accounting standards.

Accrued income, accrued expenditure and prepayments are recorded on a monthly basis where the effect of not doing so would distort the management accounts in a material manner.

## 6. Income

### 6.1 Fund income

A schedule of income recognition is held indicating how income received and associated expenditure is treated within the Trust accounts, where the source of the income is additional to or being treated differently from the treatment indicated below:

- **Unrestricted fund** – containing resources which can be spent on any purpose at the discretion of the Trustees, including:
  - fees for hiring out facilities.
  - proceeds from other trading activities.
  - donations with no restrictions attached.
- **Restricted general fund** – containing revenue (running costs) resources sourced from restricted government/ESFA/public body funding which can only be spent on the purposes for which it was given. This includes the related expenditure:
  - ESFA programme funding
  - allocation protection
  - high needs funding
  - other revenue grants such as pupil premium
  - donations with restrictions attached (i.e. received for specific revenue purposes)
- **Restricted fixed asset fund** – containing any capital funding received including condition improvement fund, devolved formula capital grant. Related expenditure, including depreciation will be charged to this fund.

### 6.2 Fees & charges

Each academy will set its fees for their chargeable services at full cost, but can apply an additional rate of return if operating in a commercial environment. VAT must be applied where appropriate.

Each academy will have a lettings policy. The policy is a statement of the aims, principles and strategy used for dealing with lettings at each academy, and contains a schedule of chargeable rates.

Each academy will have a policy in place for charging and remissions to cover items such as classroom sales, trips and activities in line with the DFE guidance for academies.

The Trust retains a central oversight of fees and charges and may override local policies in order to maximise income opportunities and/or ensure compliance with HMRC tax regulations.

### 6.3 Sales receipts

All sales income from academy customers must be fully invoiced, following receipt of a purchase order, and also fully receipted on payment.

Non-payments of sales invoices will be reported to the Finance Director to confirm if the debt is written off or referred to debt collection processes, who reserves the right to seek legal recourse.

### 6.4 Trading activities

Trading activities across the Trust will be monitored to ensure that they adhere to agreed sales and expenditure plans.

## **7. Budget management and purchasing**

### **7.1 Budget management**

The Director of Finance has delegated the responsibility for managing individual budgets to the relevant budget holders.

Notification of individual budgets will be provided by the Head of Financial Services at the start of the financial year. The Director of Finance reserves the right to change budget allocations at any time.

Budget monitoring information will be provided to budget holders on a monthly basis outlining actual expenditure against (profiled) budgets. This will be provided by Financial Services.

The budget manager is responsible for ensuring that the budget is not overspent and adheres to the intended and agreed spending plans. Significant variances should be reported to the Head of Financial Services and then to the Director of Finance.

Under/overspends cannot be transferred into or offset against subsequent financial year budgets.

### **7.2 Purchasing**

All purchases must be supported by an official authorised purchase order, which must be reconciled to the goods/services received and the final invoice. This must be authorised by the budget holder.

All period end accruals must be reported to the Head of Financial Services within the agreed timelines.

Trust purchasing documents/forms must be used to procure goods and services.

Credit card purchases should only be used in exceptional circumstances and should be fully receipted.

## 8. Procurement and Tendering

### 8.1 Staff responsibilities

All staff must ensure:

- Spending is for the purpose intended and there is probity in the use of public funds.
- Spending decisions represent value for money.
- Internal delegation limits are applied (Appendix B).
- A competitive tendering policy is in place and applied and Official Journal of the European Union (OJEU) procurement thresholds are observed where applicable.
- Purchase orders are raised for all purchases, fully authorised and matched with invoices prior to payment.

### 8.2 Contract management

The Trust will compile a central contract register maintained by each partner academy, with the relevant expiring dates. The Trust will review this annually when the budget is set to determine which contracts are due for renewal.

### 8.3 Contract process

Delegated limits for contracts are outlined in Appendix B and must be adhered to by all purchasing managers.

Where tenders are needed, they must be received by the Director of Finance or a delegated person who is not responsible or connected to the provision of the contract or contractors. Tenders will be retained securely until they are opened. This will be in the presence of two people including the Finance Director (or his delegated representative).

No supplier or contractor should be made to believe they have exclusive rights to the Trust's custom and regular re-appraisal of costs and services must be carried out.

In certain circumstances, it may not be possible to apply the delegated levels or tender processes. Requests to deviate from the agreed purchasing approach can only be sanctioned by the Director of Finance and/or Trust Board following receipt of a written request in advance. The written submission must outline how value for money has been secured.

### 8.4 Leases

Academies can only enter into operating leases e.g. rental agreements and will ask – via the Trust – for the Secretary of State's consent if they wish to:

- take out a finance lease on any class of asset for any duration from another party, as this would represent borrowing;
- take up a leasehold or tenancy agreement on land or buildings from another party for a lease term of more than five years
- grant a leasehold or tenancy agreement on land or buildings to another party for a lease term of more than five years.

### 8.5 Novel, contentious and repercussive transactions

Novel payments or other transactions are those of which the Trust has no experience, or are outside the range of normal business activity for the Trust.

Contentious transactions are those which might give rise to criticism of the Trust by Parliament, and/or the public, and/or the media. Novel and/or contentious transactions must be referred to the ESFA by the Board of Trustees for explicit prior authorisation.

## 9. Related Party Transactions

### 9.1 Register of interests

Academies will keep a register of interest that captures relevant business and pecuniary interests of members, trustees, councillors and senior employees.

### 9.2 Related party transactions

Related party transactions are goods or services provided by individuals or organisations connected to Trust. All related party transactions must be reported to the ESFA in advance of them taking place.

Related parties include:

- persons connected to an individual including relatives or a member of the same household
- a third party individual or organisation carrying on business in partnership with an Trust individual
- a company in which an individual holds more than 20 per cent of the share capital or is entitled to exercise more than 20 per cent of its voting power.

In order to ensure that there can be no real or perceived conflicts of interest the Trust will pay no more than 'cost' for goods or services provided to it by any individual or connected organisations.

While these provisions do not apply to contracts of employment, the same principles of securing value for money and using public money properly, including managing conflicts of interest, still apply. Salaries paid should be appropriate to the individual's skills and experience and the salary rates paid in the wider market.

### 9.3 Trust allowances

The Trust will reimburse trustees and councillors for actual costs incurred in carrying out their duties.

## 10. Special payments to staff

### 9.1 Staff severance payments

Academy severance payments will be managed and administered by the Trust's HR Director and approved by the Trust Board who will consider whether:

- the proposed payment is in the interests of the Trust.
- the payment is justified, based on a legal assessment of the chances of the Trust successfully defending the case at employment tribunal.

If the settlement is considered to be justified, then the Board of Trustees would need to consider the level of settlement. This must be less than the legal assessment of what the relevant body (e.g. an employment tribunal) is likely to award in the circumstances.

Where a legal assessment suggests that the Trust is likely to be successful, a settlement will not be offered.

Staff severance payments will not be made where they could be seen as a reward for failure, such as gross misconduct or poor performance. The only acceptable rationale in the case of gross misconduct would be where legal advice is that the claimant is likely to be successful in an employment tribunal claim because of employment law procedural errors. In the case of poor performance, an acceptable comparison would be the time and cost of taking someone through performance management and capability procedures.

The Trust must adhere to the academies financial handbook 2019 limits for paying non-statutory and non-contractual payments. Where a limit is exceeded, prior approval is needed from the ESFA.

### 9.2 Compensation payments

Where the Trust is deemed negligent, it will make appropriate compensation payments to provide redress for loss or injury, for example: personal injuries; traffic accidents; or damage to property. If the Board is considering making a compensation payment it will base its decision on a careful appraisal of the facts, including legal advice where relevant, and ensure that value for money will be achieved.

Where a compensation payment has been necessitated by an event that reveals concerns about the effectiveness of internal control systems, the Board of Trustees will take any necessary steps to put failings right.

### 9.3 Ex gratia payments

Ex gratia payments which go beyond statutory or contractual cover or administrative rules e.g. payments to meet hardship caused by official failure or delay, and payments to avoid legal action on the grounds of official inadequacy, will always be referred to the ESFA by the Board for prior authorisation.

### 9.4 Gifts and hospitality

Each academy will maintain a register recording the acceptance of gifts, hospitality, awards, prizes or any other benefit which might be seen to compromise the personal judgement or integrity of staff; and ensures that all members of staff are made aware of this.

Staff must declare any interest, financial or otherwise from any contractor invited to quote, tender or supply good and services to the Finance Director, who reserves the right to request that the gift be returned.

When giving gifts, the Trust ensures that the value of the gift is reasonable, the decision is fully documented, and has due regard to propriety and regularity in the use of public funds, including ESFA guidelines on the purchase of alcohol.

## 10. Fixed Assets Accounting

Fixed Assets are recorded in the Fixed Asset Register and will fall into one of the following categories:

- Land and buildings
- Plant and machinery
- Furniture, fixtures, fittings and equipment
- Computer equipment, including software
- Motor vehicles.

### 10.1 Capitalisation

Details are recorded only of assets which have been capitalised, have an individual or collective value in excess of £5,000 and will attract depreciation.

Depreciation is accounted for on all tangible and intangible fixed assets other than freehold land at rates calculated to write off the cost of each asset on a straight-line basis over its useful economic life. The useful economic life for each category of fixed asset is as follows:

Freehold Land	Indefinite
Freehold buildings	50 years
Plant and machinery	10 years
Furniture, fixtures and fittings	10 years
Vehicles	5 years
Computer equipment	4 years.

All fixed assets are reflected within the fixed assets register at the date that they are first brought into use. Assets in the course of construction are included at cost. Depreciation on these assets is not charged until they are brought into use.

### 10.2 Disposal of assets

The Academy will seek and obtain written approval from the Secretary of State, via the ESFA, for the following:

- Disposing of a freehold on land or buildings;
- Disposing of heritage assets beyond any limits set out in the trust's funding agreement in respect of the disposal of assets generally;
- Novel or contentious property transactions
- Acquiring a freehold on land or buildings.

The Trust must seek the approval of the ESFA in writing if it proposes to dispose of an asset for which capital grant in excess of £20,000 was paid. The Trust will reinvest the proceeds from all asset sales for which capital grant was paid into other academy assets. Where the sale proceeds are not reinvested then the Trust will repay the ESFA a proportion of the sale proceeds

Authorisation must be obtained to write off/disposal of other assets from the Finance Director (as indicated in Appendix B), who will inform the Head of Financial Services to update the fixed asset register and the Trust insurers.

Disposal of equipment to staff is not encouraged, unless it is on the same terms especially with regard to the benefit the Trust would obtain in any sale or scrapping of

the equipment. With the disposal of computer equipment, as the Trust will ensure that licences for software programmes have been legally transferred to a new owner.

The Board will be provided by the Finance Director with an update of write offs/disposals and this should be recorded in the minutes of the meeting, stating that Trustees have ratified the decision.

### **10.3 Equipment and inventories**

Every member of staff has a responsibility to take all reasonable steps to safeguard the Trust's assets.

Each department will be required to compile and maintain an inventory, showing date of purchase, description, serial numbers cost and location. These records will be compiled by the academy and submitted to the Trust for (audit) scrutiny on an annual basis.

All equipment and inventory items should be indelibly marked (academy name, department) to make the disposal of stolen items more difficult. Where possible, all valuable equipment and inventory items should be kept in secure rooms.

Equipment must only be taken off site, with the prior permission of the academy principal and every equipment loan should be recorded and monitored.

## **11. Pay, salaries, and salaries**

### **11.1 Responsibilities**

The Trust Board is responsible for:

- approving the pay policy;
- approving the payroll provider and ensuring that the arrangements for processing salaries, wages and pensions are in accordance with this finance policy;
- approve changes to personnel who have authorising responsibilities;
- approve pay increases annually;
- review pay structures including allowances ;
- ensuring that senior employees' payroll arrangements fully meet their tax obligations and that they comply with HM Treasury's guidance
- approving the expenses policy.

### **11.2 Senior Leadership salaries**

The Chair of the Board is responsible for authorising changes to the CEO's and the Executive Leadership team salaries. The CEO is responsible for authorising changes to Senior Leadership team salaries.

### **11.3 Changes to the Establishment**

New staff and changes to salaries of individual staff should be appointed using the business case procedure which requires sign off from an academy Principal and a member of The Prospect Executive Leadership Team. Business cases must outline the net impact on the annual pay budget.

The HR Director, is responsible for ensuring that appointment, promotion and termination of employment forms are completed and passed to Payroll for processing.

Contracts of employment are to be drawn up by TPT Core Services HR Team, and signed by the CEO or CFO but it shall not be the same person who signed the appointment form.

The HR Manager is responsible for:

- Notifying Payroll of new, discontinued or changed staff contracts and other circumstances that impact on payroll
- Maintaining a record of those authorised to make payroll changes and their specimen signatures
- Keeping personnel records for each member of staff
- Ensuring that statutory documents are kept for staff including the requirements from the pensions' schemes, which may be kept at the payroll provider's office.

The Head of Financial Services is responsible for the monthly check of the cost of employment against budget for each employee; for investigating and recording variances; and discussing with the CFO, in consultation with the Academy Principal, changes to the forecast salary costs.

The Trust has a contract with a third-party provider for the provision of payroll services.

#### **11.4 Overtime, allowances and expenses**

All overtime, allowances and expenses should be claimed in accordance with Trust/Academies rates and fully comply with HMRC regulations, i.e. fully documented and receipted and should be submitted at the end of the relevant month.

The Director of Finance reserves the right to amend the agreed submission dates.

## Appendix A - The seven principles of public life

### **1. Selflessness**

Holders of public office should act solely in terms of the public interest.

### **2. Integrity**

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

### **3. Objectivity**

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

### **4. Accountability**

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

### **5. Openness**

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

### **6. Honesty**

Holders of public office should be truthful.

### **7. Leadership**

Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

## Appendix B – Scheme of Financial Delegation

Delegated Duty	Value	Delegated Authority	Method
Ordering Goods and Services	Up to £1,000 within budget allocation	Budget Holder	Use personal discretion, while demonstrating value for money
	£1,000 to £5,000 within budget allocation	Budget Holder	Minimum of three written quotes
	£10,000 to £25,000	Finance Director and Principal	Formal tendering process
	£25,000 to £50,000	CEO and Trustee	Formal tendering process
	Over £50,000	Trust Board	Formal tendering process (unless agreed otherwise by the Trust Board, including advertising in OJEU (if over the OJEU threshold))
Disposal of assets (other than freehold land and buildings, and heritage assets, which must have Secretary of State approval)	Up to £1000	Finance Director	
	£1001 to £5,000	Trust Board	
	£5,001 and above	Trust Board and Secretary of State approval if required.	
Write-off of bad debts, entering into guarantees, giving indemnities or letters of comfort (excluding those relating to borrowing by the Trust.	Up to £1000 per debtor of income at risk through non-payment	Finance Director	
	Above £1000 per debtor.	Trust Board and where applicable the Secretary of State.	

Purchase or sale of any freehold property	Any	Secretary of State approval required	
Granting or take up of any leasehold or tenancy agreement exceeding five years	Any	Secretary of State approval required	
Lettings Policy		Academies to maintain	Reviewed annually
Finance Policy		Finance Director to maintain	Reviewed annually
Annual Accounts		Finance Director to coordinate compilation of the draft statements for approval by the Finance and Audit Committee	Completed annually in line with ESFA and Companies House deadlines