

Finance Policy

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Other documents referenced	
	Academies Accounts Direction Academies Trust Handbook Pooling Policy Reserves Policy Charging and Remissions Policy Debt Recovery Policy Financial Scheme of Delegation Procurement Policy Investment Policy Letting Policy Trust Funding Agreement Whistleblowing Policy Conflict of Interest Policy

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1. Purpose

- 1.1 The purpose of this policy and procedures is to ensure that the Dartmoor Multi Academy Trust maintains and develops systems of financial control which conform to the requirements both of propriety and of good financial management. It is essential that these systems operate properly to meet the requirements of Dartmoor Multi Academy Trust's Funding Agreement with the Secretary of State for Education, through the Education Funding and Skills Agency (ESFA)
- 1.2 The Trust must comply with the principles of financial control outlined in the academies guidance published by the Department for Education (DfE). This policy expands on that and provides detailed information on the Trust's accounting procedures. It should be read by all staff involved with financial systems and accountability.
- 1.3 This policy applies to the financial administration across the whole Multi Academy Trust including all Academies contained within it.
- 1.4 The policy also covers other finance related policies such as depreciation, tendering and investments.

2. Organisation

The Multi Academy Trust has defined the responsibilities of each person involved in the administration of the School's finances to avoid the duplication or omission of functions and to provide a framework of accountability for Trustees and staff.

Trustees

The Trustees will manage their affairs in accordance with the high standards detailed in "Guidance on Codes of Practice for Board Members of Public Bodies" and in line with the seven principles of public life:

Selflessness

Holders of public office should take decisions solely in terms of the public interest.

Integrity

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their official duties.

Objectivity

In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merits.

Accountability

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness

Holders of public office should be as open as possible about all decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

2.1 Managing School Finances

The Trustees have overall responsibility for strategic management of the School's finances. The main responsibilities of the Trustees are prescribed in the Funding Agreement between the Multi Academy Trust and the Secretary of State for Education. The main responsibilities include:

- Agree the long-term financial objectives for the Trust.
- Ensure the grant from the ESFA is used for the purposes intended.
- Compliance with the ESFA Academies Finance Handbook.
- Approval of the annual budget and any material changes.
- Approval of changes to the personnel establishment.
- Ensure a Scheme of Delegation is in place.
- Ensure assets are managed.
- Ensure accurate accounting records are maintained.
- Ensure the budget monitoring statements are a true and accurate record on income and expenditure.
- Approval of the annual accounts.
- Initial review and recommendation of the annual budget's and any material changes.
- Regular monitoring of actual expenditure and income against budget.
- Ensuring the annual accounts are produced in accordance with the requirements of the Companies Act 2006, Charity SORP and the DfE guidance issued to academies.
- Authorising the award of contracts/tenders over the specified limits.
- Recommendation of changes to the personnel establishment.
- To recommend the annual budget plan and monitor income and expenditure against budget.

2.2 Audit, Risk and Assurance Committee

The main purpose of the Audit Risk and Assurance committee is to ensure the security of the school's finances, assets and staff by:

- i. Recommending the appointment of External Auditors.
- ii. Appointment of Internal Auditors.

- iii. Receiving reports from the Internal Auditor on the financial management of the school, in particular, to consider the controls and security of the systems in use.
- iv. Receiving the opinion of the External Auditor on the financial accounts, in particular, the statement that forms part of the Annual Report.

2.3 Resources, Estates and Digital Committee

The main purpose of the Resources, Estates and Digital committee is to ensure the security of the school's finances, assets and staff by:

- i. The Resources, Estates & Digital Committee will assess the success of the Trust in managing its financial and estates resources to achieve maximum effectiveness and best value.
- ii. They will review the annual budgets, the 3 year forecasts and the monthly management accounts and make recommendations to the Board of Trustees on budget proposals..
- iii. They will review the Trusts 10 year estates plan to ensure adequacy of provision.
- iv. The Committee will also be responsible for ensuring the Trust is financially secure, has a sustainable reserves policy and complies with statutory financial reporting, the Academies Trust Handbook and Accounts Direction.
- v. The committee will also act on behalf of the full Trust Board in

2.4 Trust Leader / Chief Executive Officer (TL)

The Trust Leader & Chief Executive Officer has overall executive responsibility for the Multi Academy Trust. The Principal retains responsibilities for:

- i. Approving new staff appointments within the authorised establishment.
- ii. Authorising orders and contracts within the approval limits shown in the Financial Scheme of Delegation
- iii. Authorising payments within the approval limits shown in the Financial Scheme of Delegation
- iv. Monitoring regular budget reports with the Deputy Trust Leader and acting on any overspends or risks

The funding agreement identified the Trust Leader Officer as the Accounting Officer who is personally responsible to the Trustees for:

- i. Ensuring regularity and propriety
- ii. Prudent and economic administration
- iii. Ensuring value for money
- iv. Efficient and effective use of available resources; and
- v. The day-to-day organisation, staffing and management of the Trust

The Accounting Officer has the duty to take action if the Trustees or Chair of Trustees is contemplating a course of action, which he or she considers an infringement of propriety or regularity. Objections should be put in writing to the Trust Board, details sent to the

Permanent Secretary and the Trust's external auditors.

The Accounting Officer may delegate or appoint others to assist in these responsibilities.

2.5 Deputy Trust Leader / Chief Finance and Operations Officer (DTL)

The Deputy Trust Leader has responsibility for:

- i. ensuring forms and returns are sent to the DfE/ESFA in line with their reporting deadlines - see Appendix 2 Financial Reporting Timetable
- ii. submitting grant applications and reports to all relevant bodies as detailed in the timetable laid out in Appendix 2 Financial Reporting Timetable
- iii. The overall performance of the finance function, including all finance personnel in the Trust
- iv. The strategic leadership and direction of the finance service across the Trust, ensuring a customer led approach, support for academy-based teams and the training of new academies joining the Trust.

2.6 Director of Finance and People (DFP)

The Director of Finance and People works in collaboration with the Deputy Trust Leader, the School Finance Leads and Principals. The main responsibilities of the DFP are:

- i. the day-to-day management of financial issues including the establishment and operation of a suitable accounting system.
- ii. the management of the Trust financial position at a strategic and operational level
- iii. the maintenance of effective systems of internal control, in line with the Trusts policies and procedures
- iv. ensuring that the annual accounts are properly presented and adequately supported by the underlying books and records of the Trust
- v. the preparation of monthly management accounts.
- vi. authorising orders and the award of contracts within the approval limits shown in the Financial Scheme of Delegation
- vii. authorising payments within the approval limits shown in the Financial Scheme of Delegation

2.7 Principals

The Principals propose individual educational budgets for their school in accordance with school improvement priorities and curriculum needs to the Trust Leader and Deputy Trust Leader. They have financial responsibility and accountability in their respective schools for educational budgets which includes pupil premium, PE grant, high needs (SEND) and other school based restricted funding.

2.8 Other Staff

- 2.8.1 Other members of staff have with financial responsibilities are detailed in the Financial Scheme of Delegation.
- 2.8.2 All staff are responsible for the security of the school's property, for avoiding loss or damage, for ensuring economy and efficiency in the use of resources and for conformity with the requirements of the Multi Academy Trusts financial procedures.

2.9 Register of Interests (See Conflicts of Interests Policy)

- 2.9.1 It is important for anyone involved in spending public money to demonstrate that they do not benefit personally from the decisions they make. To avoid any misunderstanding that might arise, all Trustees, Governors and staff with significant financial or spending powers are required to declare any interests they have in companies or individuals from who the Multi Academy Trust may purchase goods or services. The register is open to public inspection.
- 2.9.2 The register should include all business interests such as directorships, shareholdings or other appointments of influence within a business or organisation. The disclosures should also include business interests of relatives such as a parent, spouse, child, business partner and close family members. A full definition is available in the Academies Trust Handbook.
- 2.9.3 The existence of a register of business interests does not, of course, detract from the duties of Trustees, Governors and staff to declare interests whenever they are relevant to matters being discussed by the Governing Body or a committee. Where an interest has been declared, Trustees, Governors and staff should not attend that part of any committee or other meeting.
- 2.9.4 The Trust must publish on their website relevant business and pecuniary interests of members, trustees, local stakeholder board members and accounting officers. The Trust has discretion over the publication of interests of other individuals named on the register.

2.10 Internal Scrutiny

- 2.10.1 Internal Auditors are appointed by the Audit Risk and Assurance Committee and provide Trustees with an independent oversight of the Multi Academy Trust's financial and non-financial affairs. The main duties of Internal Audit are to provide the Trustees with independent assurance that:
 - a) the financial responsibilities of the Trustees are being properly discharged
 - b) resources are being managed in an efficient, economical and effective manner
 - c) sound systems of internal financial control are being maintained in each school within the Multi Academy Trust
 - d) financial considerations are fully taken into account in reaching decisions

A programme of checks will be agreed with the Trustees and financial reviews will

be carried out in order to provide the Trustees and indirectly the Department for Education with the required assurance.

Programmes of internal scrutiny must focus on:

- a) Evaluating the suitability of, and level of compliance with, financial and nonfinancial controls. This includes assessing whether procedures are designed effectively and efficiently, and checking whether agreed procedures have been followed
- b) Offering advice and insight to the board on how to address weaknesses in financial and non- financial controls, acting as a catalyst for improvement, but without diluting management's responsibility for day to day running of the trust
- c) Ensuring all categories of risk are being adequately identified, reported and managed.

A report of the findings from each visit will be provided to the Audit Committee and are made available to external auditors to review as part of their annual external audit procedures.

2.11 Audit arrangements

External auditors must be appointed in accordance with the Academies Trust Handbook.

3. Financial Planning

The Multi Academy Trust's and the individual schools' Annual Plans contribute to the framework for the annual budget and the long-term financial planning. The budget is a detailed statement of the expected resources available to the Multi Academy Trust and individual schools and the planned use of those resources for the following year and the following two years.

The budgetary process is described in more detail below.

3.1 Budget arrangements

The Trust Leader and Deputy Trust Leader are responsible for working with school Principals and others to prepare a 3-year budget plan for consideration by the Trust Board.

The Trust Leader and Deputy Trust Leader are also responsible for setting pooled budgets.

The DFP is responsible for establishing a timetable which allows sufficient time for the approval process and ensures that the submission date is met.

The budget will reflect the best estimate of the resources available to the schools for the forthcoming year and will detail how those resources are to be utilised. There will be a clear link between the Trust and School Development Plan objectives and the budgeted utilisation of resources.

The budgetary process will incorporate the following elements:

- forecasts of the likely number of students to estimate the amount of General

Annual Grant (GAG) receivable.

- review of other income sources available to assess likely level of receipts.
- review of the main expenditure headings in light of the Trust and School Development Plan objectives and the expected variations in cost e.g., pay increases, inflation and other anticipated changes.

3.2 Finalising the Budget

Once the different options and scenarios have been considered, the draft budget should be submitted with a statement of assumptions to the Trust Board for approval. The budget should be communicated to all staff with responsibility for budget headings so that everyone is aware of the overall budgetary constraints. The budget should be seen as a working document which may need revising throughout the year as circumstances change.

3.3 Budget management, monitoring and review

A monthly report for each school and budget holders will be prepared and made available by the Trust Finance Team. Summary reports for ring-fenced budgets ¹ will be made available for Local stakeholder boards termly.

The Deputy Trust Leader and Principal may delegate elements of the budget to staff where this is appropriate. These budget holders must operate within the same objectives and controls as those agreed for the School as a whole. Delegated budget holders will be provided with sufficient information to enable them to perform adequate monitoring and control. Such budget holders are accountable to the Principal who are responsible for ensuring mechanisms exist to enable such delegated budgets to be monitored and managed.

Any potential overspend against the budget must in the first instance be discussed with the Deputy Trust Leader.

The monitoring process should be effective and timely in highlighting variances in the budget so that differences can be investigated, and action taken where appropriate.

The Trust Board will continually monitor the quality of the financial information presented to ensure that what is provided remains appropriate, particularly in terms of the timing, level of detail and narrative.

4. Accounting system

All the financial transactions of the Trust must be recorded in the accounting system. The Accounting system is controlled by the Finance team and includes the following key elements:

- Income
 - Purchasing
 - Payments
 - Payroll
 - Assets
-

¹ Pupil Premium, Sports Premium, SEND

- Bank Accounts
- Liabilities

Detailed information on the operation of the accounting system can be found in the user manuals held at the Central office.

5. Payroll

5.1 Payroll system

The main elements of the payroll system are:

- staff appointments & departures
- payroll administration
- payments

Detailed information on the operation of the payroll system can be found in the user manuals held at the centrally.

5.2 Payments and Monitoring of the Payroll

- 5.2.1 The monthly payroll reports must be reviewed and authorised together with authority to release payment by the Accounting Officer and Deputy Trust Leader, this may be delegated to the DFP for review.
- 5.2.2 Usual salary payments are made by BACS, all salary payments will be made by electronic bank transfer.

5.3 Severance Payments

- 5.3.3 The Trust has delegated authority to approve individual staff severance payments provided any non-statutory/non-contractual element is under £50,000 gross (i.e., before income tax or other deductions).
- 5.3.4 Where the trust is considering a non-statutory/non-contractual payment of £50,000 or more, (gross, before deductions), ESFA's prior approval must be obtained before making any binding offer to staff.
- 5.3.5 The Trust should demonstrate value for money by applying the same scrutiny to a payment under £50,000 as those over £50,000 and have a justified business case. Settlements must not be accepted unless satisfying the conditions in the Academies Trust Handbook and in the ESFA's guidance and submission template.
- 5.3.6 As set out in the Academy Trust Handbook, ESFA's prior approval is required for special severance payments where any of the following scenarios arise individually or collectively:
- (i) the proposed special staff severance payment is for £50,000 (gross, before income tax or other deductions) or more
 - (ii) a special staff severance payment for any value is proposed and the trust is under a Financial Notice to Improve (FNti) or a Notice to Improve (Nti)

- (iii) an exit package which includes a special severance payment is at, or above, £100,000 (gross)
- (iv) the employee earns over £150,000 (gross). For this purpose, earnings will not include employer pension contributions

5.3.7 The Accounting Officer must sign off and review each business case.

5.4 Ex-gratia payments

- 5.4.1 Ex gratia payments are another type of transaction going beyond statutory or contractual cover, or administrative rules. A4.13A of the HM Treasury publication Managing Public Money provides examples, including payments to meet hardship caused by official failure or delay, and to avoid legal action due to official inadequacy.
- 5.4.2 Ex gratia transactions must always be referred to ESFA for prior approval. HM Treasury approval may also be needed. HM Treasury approval may also be needed.

6. Purchasing and payments

The Multi Academy Trust will achieve the best value for money for all purchases following the general principles of:

- a. Probity: it must be demonstrable that there is no corruption or private gain involved in the contractual relationships of the Trust
- b. Accountability: the Trust is publicly accountable for its expenditure and the conduct of its affairs.
- c. Fairness: that all those dealt with by the Trust are dealt with on a fair and equitable basis.

The DFP will ensure that there is a clear separation of duties within the finance team, such that one individual is not able to process a complete transaction.

The purchase of alcohol is not permitted, except where it is to be used in religious services.

6.1 Orders for Goods and Services

Official orders will be raised using the Trust's accounting system on receipt of a duly authorised requisition. All Purchases must be carried out in line with the authorisation limits detailed in Appendix 1.

Telephone/direct verbal ordering will be permitted only in situations where raising an official order is not practicable or the purchase is urgent (e.g., emergency works) and with prior approval from the Deputy Trust Leader and/or DFP depending on order value restriction. In such cases, a written confirmation order will be raised as soon as possible, normally within 24 hours.

6.2 Value for Money Policy Statement

- 6.2.1 The Trust has a responsibility in achieving the best possible educational and wider societal outcomes through the economic, efficient and effective use of resources, the avoidance of waste and extravagance, and prudent and economical administration.
- 6.2.2 In order to achieve value for money, all orders are subject to the rules concerning quotes and tenders below. Exceptions to this will be
 - a. where the market has already been competitively tested by a third party for example a DfE recommended framework or other Public Sector Buying Organisation (PSBO) tendered framework
 - b. where a single action tender is appropriate
- 6.2.3 Where an order is below the EU Threshold for Public Procurement (see appendix 2) and Trustees believe it is in the best interest of the Multi Academy Trust to appoint a supplier through a direct award tender, the reasons and methodology for reaching that decision must be clearly documented.
- 6.2.4 Value for money will be considered in a way to ensure that time and resources are not wasted in investigating minor areas where few improvements can be achieved, or minor savings made at the expense of resource allocated to more important or valuable areas.

6.3 Basic principles

- 6.3.1 This document applies to any contract for services, supplies or works which results in a payment being made by the Trust or an Academy.
- 6.3.2 The basic principle is that procurement should deliver value for money to the Trust.
- 6.3.3 The procurement process should be considered before any purchase is made. There are specific rules in the Academies Trust Handbook in relation to some types of leasing arrangements and novel/contentious transactions which require Secretary of State consent. Leases are outside of the scope of this document and guidance must be obtained from the DFP.
- 6.3.4 If an order is placed outside of the purchasing requirements, this must be agreed by the DFP or DTL (depending on value). These exceptions will be reported at the next Audit committee, detailing the transaction and the reason the exception was necessary.
- 6.3.5 All bidders in a competition ("Bidders") should be treated in a way which ensures equality of treatment, non-discrimination and transparency, for example:
 - a) all Bidders must be given the same information at the same time, and no Bidder should be treated more favourably than another;
 - b) there must be clear and transparent timescales, requirements, specifications and deadlines to comply with any competition.

6.4 Using Existing Framework Arrangements

- 6.4.1 Wherever possible and in accordance with the Academies Trust Handbook and DfE policy, the Trust should avoid running its own procurement processes, and instead

use an existing framework arrangement.

- 6.4.2 From time to time the Trust may also set up its own framework agreements which can be used by all Academies. Such frameworks will be notified to Academies. Forms of Tenders.

6.5 Valuing contracts

- 6.5.1 It is important that contracts are properly assessed for value. In particular, a contract will not be deliberately divided into smaller contracts with the effect of avoiding the procurement rules. The contract value is based on the total value of the expenditure which is the subject of the procurement. All Academies' needs should be combined into one procurement if they are the same or similar. The estimated duration of the contract must include any extensions or options to renew

6.6 Procurement Process

The procurement process will depend on the value and nature of the requirement in line with the limits set out in Appendix 2.

Where it is determined that a tender process will be followed, the Trust will use the appropriate tender process as set out below:

- a) **Open Tender:** This is where all potential suppliers are invited to tender. The budget holder must discuss and agree with the Deputy Trust Leader how best to advertise for suppliers e.g., general press, trade journals, or to identify all potential suppliers and contact directly if practical. This is the preferred method of tendering, as it is most conducive to competition and the propriety of public funds.

- b) **Restricted Tender:** This is where suppliers are specifically invited to tender. Restricted tenders are appropriate where:
 - i. there is a need to maintain a balance between the contract value and administrative costs,
 - ii. a large number of suppliers would come forward or because the nature of the goods is such that only specific suppliers can be expected to supply the School's requirements,
 - iii. the costs of publicity and advertising are likely to outweigh the potential benefits of open tendering.

- c) **Negotiated Tender:** The terms of the contract may be negotiated with one or more chosen suppliers. This is appropriate in specific circumstances:
 - a. the above methods have resulted in either no or unacceptable tenders,
 - b. only one or very few suppliers are available,
 - c. extreme urgency exists,
 - d. additional deliveries by the existing supplier are justified.

Full consideration should be given to:

- a) objective of project

- b) overall requirements
- c) technical skills required
- d) after sales service requirements
- e) form of contract.

6.7 Tender Procedures

The invitation to tender should state the date and time by which the completed tender document should be received by the Trust.

Tenders issued by the Trust must be issued in line with recommended practice detailed in this policy.

6.8 Tender Evaluation Procedures

1. The evaluation process should follow the procedure above. Those involved should disclose all interests, business and otherwise, that might impact upon their objectivity. If there is a potential conflict of interest, then that person must withdraw from the tendering process.
2. Those involved in making a decision must take care not to accept gifts or hospitality from potential suppliers that could compromise or be seen to compromise their independence.
3. Tender Evaluation criteria will be determined within the tender document to ensure full transparency. Full records should be kept of all criteria used for evaluation
4. Where required by the conditions attached to a specific grant from the DfE, the department's approval must be obtained before the acceptance of a tender.
5. The accepted tender should be the one that is economically most advantageous unless it can be demonstrated that is not the best option for the Trust. All parties should then be informed of the decision.

6.9 Payments to Individuals

Payments can be made to individuals on production of an invoice. An enquiry must be carried out on the individual on the HMRC, off payroll working rules site (IR35) and a reference number obtained before services are procured. The link is:

<https://www.gov.uk/guidance/check-employment-status-for-tax>

6.10 Audit Trail

6.10.1 This section applies to all contracts, regardless of value or duration.

6.10.2 A clear audit trail must be kept for all purchases. The level of detail required will increase with the value of the procurement. The written record must include:

- a. Who was responsible for making the decision to procure, and details of their decision-making process;
- b. Who was responsible for evaluation of tenders, and details of the evaluation, if applicable;
- c. Be available in the Trust's online systems at all times for audit purposes.
- d. All purchases must be raised on a purchase order excluding those exceptions referenced in the finance manual.

6.10.3 In each case, the written record must include copies of all original documentation used during the procurement such as tender packs, quotes, contracts and invoices

7. Income

The main sources of income for the Multi Academy Trust are the grants from the ESFA and other outside agencies and funding from the Local Authority. The receipt of these sums is monitored directly by the Director of Finance and Chief Finance and Operations Officer who are responsible for ensuring that all grants due to the Schools within the Multi Academy Trust are collected.

The Schools also obtains income from:

- Students and parents, mainly for trips, school meals, nursery fees, uniforms, etc
- the public, mainly for lettings.

7.1 Trips/Activities

7.1.1 The school is responsible for raising any payment and consent requests through the Trust's online payments system, monitoring payment receipts and following up non-payment or late payment. The Outdoor Trips Policy

7.1.2 The Trust Charging and Remissions policy includes procedures for Trips and details operational tolerances for repayment of any surplus received (e.g. when all pupils sign up for a given Trip) and identification by the school of which budgets which fund any shortfall (e.g. where fewer than expected pupils contribute to a given Trip).

7.1.3 The Outdoor Trips Policy should be also checked whenever a School is planning to make a trip in conjunction with the finance policy.

7.2 Lettings

The Trust Lettings Policy details arrangements is contained in a separate document. The Policy and charges will be reviewed annually and approved by Trust Board.

7.3 Debtors

Debts may be written off in accordance with the Funding Agreement and as detailed in the annual funding letter. The Finance Team will be responsible for chasing outstanding debts. Please see separate Debt Recovery Policy.

8. Cash Management

8.1 Bank Accounts

The opening of all accounts must be authorised by the Trust Board who must set out the arrangements covering the operation of accounts in the Financial Scheme of Delegation. This should include any transfers between accounts and cheque signing arrangements. The operation of systems such as Bankers Automatic Clearing System (BACS) and other means of electronic transfer of funds must also be subject to the same level of control.

8.2 Deposits

Particulars of any deposit must be entered in the accounting system with supporting paperwork. The details will include:

- the amount of the deposit
a reference, such as the number of the receipt or the name of the debtor.

8.3 Payments and withdrawals

All cheques and other instruments authorising withdrawal from Trusts bank accounts must bear the signatures in line with the bank mandate.

8.4 Bank Reconciliations

The DFP will ensure reconciliations are performed at least on a monthly basis. Reconciliation procedures will ensure that:

- i. all bank accounts are reconciled to the Trust's accounting system
- ii. reconciliations are prepared by the Finance Team
- iii. reconciliations are subject to an monthly review carried out by the DFP
- iv. adjustments arising are dealt with promptly.

8.5 Petty Cash Accounts

Petty cash is not permitted to be held within schools.

8.6 Student Visits

When it is necessary for staff to have access to money during a School visit every effort will be made to minimise the amount of cash being carried. Pre-paid charge cards will be issued by the Finance Team consistent with the budget previously approved for the visit.

8.7 Cash Flow Forecasts

The DFP is responsible for preparing cash flow forecasts to ensure that the Multi Academy Trust has sufficient funds available to pay for day-to-day operations. If significant balances can be foreseen, steps should be taken to invest the extra funds.

8.8 Investments

Investments must be made only in accordance with procedures approved by the Trust Board. The Multi Academy Trust has approval to invest any surplus funds on a suitable bank money market dependant on market rates and at the discretion of the Chief Finance and Operations Officer.

Please see separate Investment policy.

9. Fixed assets

9.1 Asset Purchases and Disposals

9.1.1. The Trust will obtain approval from the ESFA for the following transactions:

- a) Acquiring a freehold of land or buildings;
- b) Disposing of a freehold of land or buildings;
- c) Disposing of heritage assets, as defined in financial reporting standards, beyond any limits in the Trust's funding agreement for the disposal of assets generally.

9.1.2. Other than the transactions outlined in 8.1.1. above the Trust does not need the ESFA's approval to dispose of any other fixed assets.

- Any disposal will maintain the principles of value for money, regularity and propriety.
- The Trust Board will refer to the DfE's 'Good Estate Management for Schools' guidance to help them to manage capital assets and budgets.

9.1.3 The Trust will manage and oversee assets and maintain a fixed asset register.

9.1.4 Disposal of equipment to staff is not encouraged, as it may be more difficult to evidence the School obtained value for money in any sale or scrapping of equipment. In addition, there are complications with the disposal of computer equipment, as the School would need to ensure licences for software programmes have been legally transferred to a new owner. For this reason, IT and personal communications equipment should not be disposed of directly to staff.

9.1.5 The Multi Academy Trust is expected to reinvest the proceeds from all asset sales for which capital grant was paid in other School assets. If the sale proceeds are not reinvested, then the Trust must repay to the DfE a proportion of the sale proceeds.

9.2 Fixed Asset Register

- 9.2.1 A Fixed Asset Register must be maintained at all times.
- 9.2.2 This Register must be updated regularly and should reflect a complete and accurate list of fixed assets.
- 9.2.3 For all capital items acquired over the Trust capitalisation threshold the values must be included in the Fixed Asset Register.

The Trust capitalisation threshold is capital items with a value or aggregate value of over £3,500 any capital purchases not meeting this level is deemed revenue expenditure.

9.3 Security of asset

- 9.3.1 Stores and equipment must be secured by means of physical and other security devices.
- 9.2.2 All the items in the register should normally be permanently and visibly marked as the School's property and there will be a regular (at least annual) count by someone other than the person maintaining the register. Discrepancies between the physical count and the amount recorded in the register will be investigated promptly. Inventories of School property will be kept up to date and reviewed regularly. Where items are used by the School but do not belong to it this will be noted.

9.4 Loan of Assets

- 9.4.1 Items of School property must not be removed from School premises without the authority of the appropriate Team Leader/Line Manager. A record of the loan must be recorded on the individual Personnel file.
- 9.4.2 If assets are on loan for extended periods or to a single member of staff on a regular basis the situation may give rise to a 'benefit-in-kind' for taxation purposes. Loans should therefore be kept under review and any potential benefits discussed with the DFP.

9.5 Inventories

- 9.5.1 A central record of all portable items having a value of £250 or more will be kept by the School.
- 9.5.2 Items of less than £250 whose attractiveness and portability makes them liable to unauthorised use or removal will also be recorded.
- 9.2.3 A complete inventory check will be carried out annually to ensure list is accurate and up to date, by the Heads of schools and principals.

10. Depreciation Policy

Dartmoor Multi Academy Trust will depreciate fixed assets in line with recognised accounting standards, academy best practice and DFE guidelines. Any changes to the

depreciation accounting must be approved by the Trust Board.

- 10.1.1 Assets will be depreciated for a full year in the year of purchase irrespective of the stage in the year they are acquired, and assets will not be depreciated in the year of disposal.
- 10.2.2 Refurbished assets that have been gifted where the useful economic life is not readily and reliably estimated, the asset will be fully depreciated in the year of the gift.
- 10.2.3 Depreciation is provided for at the following annual rates in order to write off each asset over its estimated useful life:
 - a) Freehold/Leasehold buildings – Shorter of 50 years or useful economic life.
 - b) Freehold Land - not depreciated
 - c) Leasehold Land – shorter of 125 years or the term of the lease
 - d) Furniture and equipment – 5 years straight line
 - e) Plant and equipment – 5 years straight line
 - f) Motor vehicles – 25% reducing balance
 - g) Computer equipment – 3 years straight line
 - h) Intangible Fixed assets - Software licences longer than twelve months - 5 years or useful economic life (each asset will be considered individually) – straight line

11. Trust Companies Policy

Dartmoor Multi Academy Trust will not form any companies, subsidiaries or joint ventures without the approval of the Trust Board.

12. Donations Policy

- 12.1 Dartmoor Multi Academy Trust welcomes offers of donations of all sizes, whether in connection with specific campaigns or to add to the Multi Academy Trust's reserves as these enable the Multi Academy Trust's continuing development over the long term.
- 12.2 Donations must be freely given with no expectation of anything in return other than due thanks and recognition. Dartmoor Multi Academy Trust are pleased to accept lawful donations which are given in good faith and which are compatible with the Trust's aims, values and strategic objectives. As the Trust values and safeguards its autonomy, integrity and reputation, Dartmoor Multi Academy Trust do not accept donations when a condition of acceptance would compromise these fundamental principles.

13. Reserves

The Dartmoor Multi Academy Trust plans to spend the majority of its revenue income each year on the students in its care. The Trust has a separate Reserves Policy is should be read for specific details.

14. VAT

The Trust is registered for VAT. VAT Claims will be made in accordance with HMRC guidelines. The Deputy Trust Leader is responsible for ensuring this is carried out correctly with support from the DFP.

15. Anti-fraud (see also Trust's Whistleblowing Policy)

- 15.1 Fraud includes all irregularities which could normally be described as theft, deception, fraud, corruption, or impropriety. The prevention of fraud and the protection of the school's assets is the responsibility of every member of staff. Suspicions should be reported as described in the Whistleblowing policy. Occurrences of fraud will be reported to the Chair of the Trust Resources, Estates & Digital Committee and the Trust Audit Risk and Assurance Audit Committee. If fraud is confirmed, then the Trust Audit committee after seeking advice from the Trust's internal auditors will review the circumstances to ensure preventative action is taken to reduce the chance of a reoccurrence.
- 15.2 The Trust and individual school management have responsibility for the prevention, detection and investigation of irregularities. The Trust's internal audit service assists by examining and evaluating the adequacy and effectiveness of the actions taken to fulfil this obligation. Irregularities include:
- a) fraud, which includes the misappropriation of money and property.
 - b) corruption
 - c) financial malpractice
 - d) embezzlement
 - e) serious mal administration
 - f) unethical practices that are not necessarily criminal
- 15.3 All members of staff have a duty to comply with the Trust's regulations and to behave honestly and with integrity.
- 15.4 The Trust's Whistleblowing Policy encourages staff to voice any reasonably held suspicion as part of an effective anti-fraud culture. This whistle blowing policy sets out the Trust procedure and informs staff of their rights and obligations under the Public Interest Disclosure Act 1998.
- 15.5 The Trust incorporates recommendations made by the internal audit service to strengthen the Trust financial and operational systems of control.

15.7 Action

- 15.7.1 All actual or suspected incidents should be reported immediately to the Trust Leader (unless the Trust Leader is suspected, in which case it will be reported directly to the Chair of Trustees) and Chair of Trustees and Chair of the Resources Estates & Digital Committee. The Trust Leader will make any initial enquiries considered necessary to clarify the situation. The Chair of the Trust Audit Risk and Assurance Committee will also be informed by the Trust Leader Officer.
- 15.7.2 The Trust Leader/Chair of Board Resources, Estates & Digital Committee will decide the action to be taken including the need to commission special investigations and the resource implications. They will follow the Trust's conduct policy in relation to allegations of fraud involving a member of staff.
- 15.7.3 The circumstances in which the Trust must inform the funding body about actual or suspected frauds are detailed in the ESFA Academy Trust Handbook. The Trust Leader is responsible for informing the funding body of any such incidents.

15.8 Recovery of loss

The amount of any loss should be quantified, and repayment of losses sought in all cases. Where the loss is substantial legal advice should be obtained without delay.

16. Giving of Gifts Policy Statement

The Trust recognises that there will be times when it is appropriate for the Trust or a school to show appreciation or condolences by way of a small gift. These gifts must be authorised by the Accounting Officer. The value will not exceed £40.00 and will not include the purchase of alcohol.

17. Appendix 1 – Authorisation Limits for Purchasing

17.1 Ordering and Invoicing of Budgeted Items

Tier	Group	Placing and order	Authorising an order (1 signature, up to £X)	Authorisation of invoice for payment (1 signature, up to £X)	Notes
1	Budget Holders	∞	500	N/A	
2	Principal/Associate Principal (Primaries)	∞	5000	N/A	
3	Associate Principal (Secondaries)	∞	2,500	N/A	
4	Executive Principals/Lead Principals (Secondaries)/Trust Finance & Business Manager	∞	5,000	5,000	
5	Director of Finance	∞	15,000	15,000	
6	Deputy Trust Leader	∞	50,000	50,000	*
7	Trust Leader /Accounting Officer	∞	75,000	75,000	*
8	Resources, Estates and Digital Committee	∞	Above 75,000 up to 500,000	N/A	*
9	Board of Trustees	∞	Over 500,000	N/A	

- i. Purchases over £50,000 must be authorised by 2 signatories.
- ii. Principals and above can authorise all orders for catering provision and exam fees regardless of value.
- iii. All instances where entering into a contract or lease for more than one year must be referred to the Deputy Trust Leader. When entering into a contract, the value of the order should be for the total contract amount as opposed to the periodical payment amount.
- iv. Resources, Estates and Digital committee review tender/orders which are above Trust Leader's threshold to allow recommendations brought to them by the Deputy Trust Leader. This will be subject to approval by the committee not a single Trustee on that board.
- v. These authorisation limits apply to all purchases regardless of payment method.

17.2 Non-order Invoices

It is not always necessary to raise an order for a purchase. Due to their nature, the following purchases do not require purchase orders:

- i. Utilities bills (Gas, Electricity, Water etc).
- ii. Emergency works (must be referred to central premises team).
- iii. Cycle and Tech scheme orders (inbuilt authorisation at time of purchase).
- iv. Childcare vouchers (in built authorisation at time of purchase).
- v. Catering provisions (not required due to nature)
- vi. Exam fees (not required due to nature)

- vii. Lease arrangements (an order for the total value of the lease is required at commencement only)
- viii. Agency staff (in built authorisation at time of purchase).
- ix. Babcock LDP Educational Welfare services or other Educational support services

All other purchases must have an authorised purchase order raised on the accounting system before the goods and services have been received and before the goods and services have been invoiced.

17.3 Budget check facility/ Unbudgeted Expenditure

- i. At the ordering stage, It is the responsibility of the staff member making the order and the staff member authorising to have due regard for the level of funds available within the budget line at the time of ordering. The Trust's cloud procurement portal enables built in budget checking.
- ii. Any order that would exceed the available budget must be agreed with the Deputy Trust Leader before authorisation.

17.4 Bank payments

All bank payments are authorised on the Bank website and must be authorised by 2 bank signatories. **Bank signatories are (but not limited to):**

- Trust Leader
- Deputy Trust Leader
- Director of Finance & People

17.5 Procurement card payments

Purchases made with the procurement card (as opposed to BACS) are subject to the same authorisation limits stated in 1.1 and follow the same authorisation process.

Procurement Cards are held by:

- Deputy Trust Leader
- Director of Finance & People

18. Appendix 2 – Value for Money Limits (Quotes and Tendering)

18.1 Value for Money Procedures

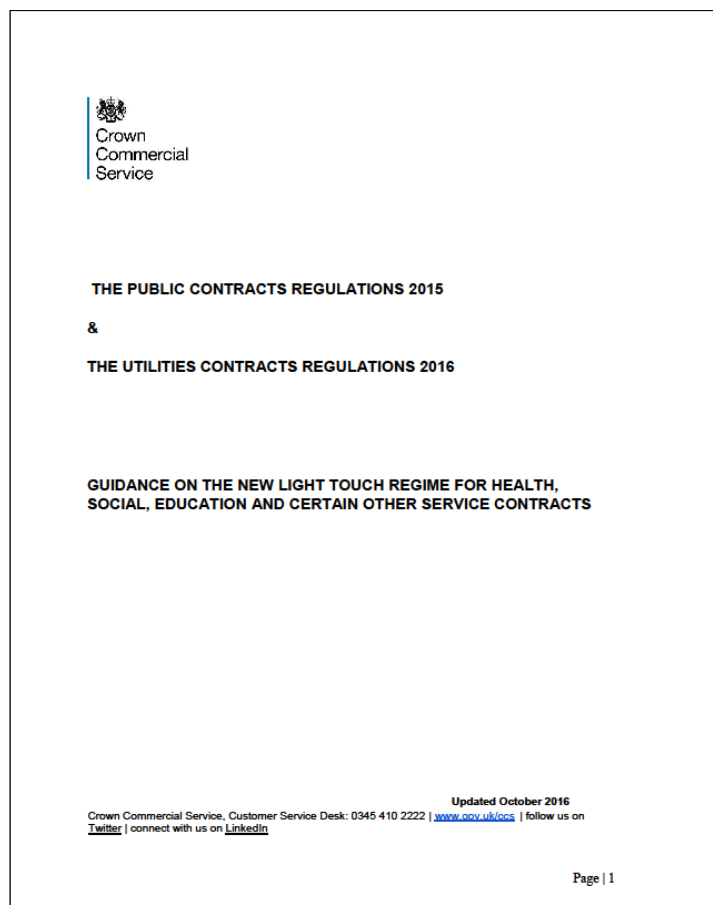
Value of Order (£, net)	VFM Procedure
Below 1,000	Consideration to be given to obtaining best value (this can be reference to catalogue price lists or online prices, verbal/telephone quotes, email quotes, availability, quality, lack of alternatives etc). Detailed narrative on requisition form is adequate. Use of a public sector framework must be considered.
1,001 to 2500	Requires minimum of two verbal/ written quotes. Written details of quotations obtained should be prepared and attached to requisition for audit purposes. For all works and for services over £10,000 a written specification or service level agreement must be obtained. Use of a public sector framework must be considered. Use of Trust's eTender portal is optional.
2,500 - 10,000	Requires minimum of three quotations. Expressions of interest must be invited from a minimum of three bidders. Use of Trust's eTender portal is optional.
10,001 to 50,000	Use of a public sector framework must be considered. Expressions of interest must be invited from a minimum of three bidders. For all works, a tender must be issued to a minimum of three bidders, based on a written specification. Evidence to be attached to the requisition. Use of Trust's eTender portal is optional.
Over 50,000	Use of a public sector framework must be considered. Goods/services ordered with a value over £50,000, or for a series of contracts which in total exceed £50,000 must be subject to tendering procedures as detailed below.

18.2 Formal Tendering Procedures

Tenders over £50,000 - the Trustees will review the tender scope and specification before it goes out to bidders, either at a meeting or by email. The Trust Resources Estates & Digital committee decide at this point whether they wish to delegate the authority to accept the Tender to the Trust Leader and Deputy Trust Leader, whocould award the contract to the best value contractor only, or if they wished to convene a meeting of the Trust Resources, Estates and Digital committee to award the contract. This decision would be based on the level of risk involved.

- 18.2.1 **Utility tenders** - authority to accept these is delegated to the Trust Leader * & Deputy Trust Leader who are authorised to award the contract to the best value supplier only.
- 18.2.2 **Tenders over the OJEU Threshold** – Guidance on the OJEU thresholds is given in the Academies Trust Handbook.
- 18.2.3 **Public Procurement Thresholds** – The Trust sets the internal procurement guidance so that they do not cross over the Department for Education set buying procedures and procurement law for schools, which comply with the Public Contracts Regulations procurement rules.

The thresholds for 2022/23 are (NB these thresholds will be subject to review in January 2024): Goods – £213,477
Works – £5,336,937
Most services –
£213,477



Some services for education, health and care are covered by the 'light touch regime'. The threshold for these is £663,540. These cover most services as a Trust we would contract and include utility contracts, which are substantially some of our biggest procurement values. Where guidance is needed reference to the Public Contracts Regulations is recommended.