RIVERSIDE SCHOOL

Finance Policy

APPROVED BY GOVERNORS

RESPONSIBLE PERSON – HEADTEACHER

May 2025

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Statement of Intent

At Riverside School, the governing board is committed to ensuring sound financial controls are in place and all expenditure is in line with best value principles.
All staff and governors are required to comply with this policy, which sets out the framework within which the school conducts its finances.

All parties concerned are expected to be aware of their responsibilities with regard to sound internal financial controls. The implementation of the following practices and procedures will ensure that funds are efficiently used to enhance pupils' education.
This policy aims to ensure that:

- All procurement arrangements achieve value for money.
- There are sound procedures in place for administrating payroll and personnel matters.
- All income is identified, and all collections receipted, recorded and banked promptly.
- The school is adequately insured against exposure to risk.
- The use of petty cash is tightly controlled.
- The school provides training in financial administration to relevant members of staff.

1. Legal Framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- The School Staffing (England) Regulations 2009
- The School Governance (Roles, Procedures and Allowances) (England) Regulations 2013 (as amended)
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- DfE 'Staffing and employment advice for schools'
- DfE 'Schemes for financing local authority maintained schools'
- DfE 'Good estate management for schools'
- DfE 'Buying for schools: things to consider before you start'
- DfE 'School teachers' pay and conditions document 2023 and guidance on school teachers' pay and conditions' (STPCD)
- DfE 'Implementing your school's approach to pay'

This policy operates in conjunction with the following school policies:

- Charging and Remissions Policy
- Data Protection Policy
- Gifts and Hospitality Register

- Governors' Allowances Policy
- Lettings Policy
- Staff Code of Conduct
- Pay Policy – Support Staff
- Pay Policy – Teaching Staff
- Appraisal Policy – Teaching Staff
- Capability Policy – Teaching Staff
- Raising Concerns in School Policy

2. Roles and Responsibilities

The governing board has overall responsibility for overseeing the financial performance and financial health of the school and in ensuring effective controls are in place to manage available resources and ensure regularity, propriety and value for money.

Governors will be responsible for:

- The management of the school's delegated finances, including the setting of the school budget, which will be spent according to the LA's scheme for financing schools.
- Making sure its budget reflects the school's educational objectives and is linked to the SDP.
- Ensuring money is spent for the educational benefit of pupils attending the school, and for the benefit of pupils in other schools.
- Developing a financial plan (SDP) which establishes best value principles.
- Demonstrating compliance with the value for money requirements of their dedicated schools grant, through the annual submission of the schools' financial value standard (SFVS).
- Identifying and requesting the financial information needed to ensure spending is in line with projections.
- Ensuring that pupil premium and the PE and sport premium are being spent on improving participation and attainment for eligible pupils.
- Considering information presented by the headteacher, school resources committee and/or the finance team with regards to financial matters, including when considering the SFVS.
- Maintaining an up-to-date register of pecuniary interests annually - each governor and attendee will declare any interests at the beginning of any full governing board or committee meeting.
- Delegating financial responsibilities to the resources committee and headteacher as appropriate.
- Making any pay decisions at the school, including reviewing each teacher's salary on an annual basis.
- Ensuring arrangements are in place for notifying staff members of their positions on the pay range, as well as any allowances they may be eligible for.
- Ensuring that sufficient funds are available to support pay decisions.
- Determining the extent to which specific functions relating to pay determination

and the appeals process will be delegated to others.

The headteacher will be responsible for:

- Prioritising and allocating financial resources appropriately, ensuring efficiency, effectiveness and probity in the use of public funds.
- Implementing the decisions of the governing board.
- Working with the finance team to put together a three-year budget forecast.
- Working with the finance team to draft and monitor the annual budget.
- Advising the governing board and providing the required information that assists them with developing the school’s financial plan and the annual budget.
- Ensuring that all monies controlled by the school are handled in accordance with LA regulations and sound financial practice.
- Overseeing staff dealing with finances and ensuring that procedures are carried out accurately.
- Making ad-hoc checks of procedures.
- Submitting any pay recommendations to the governing board for approval.
- Ensuring that the governing board has sufficient evidence upon which to make decisions regarding pay.
- Keeping teachers well-informed of any decisions made regarding pay progression, as well as ensuring that written records are held.
- Maintaining records or decisions and recommendations made, and evidencing that all decisions have been made fairly.

The administration of financial procedures may be delegated to the resources committee, the finance team, external finance support, or other members of staff, and the details of this delegation will be recorded in the Finance Policy.

The governing board has delegated responsibilities to the resources committee in the following areas of financial management:

- Agree and monitor a three-year budget plan which is clearly linked to the SDP
- Maintain and review this policy annually
- Keep in-school financial procedures under review
- Assist with the annual budget for approval by the governing board
- Support with or receive information regarding the tender for contract services
- Monitor the financial position of the school
- Authorise any virement over £10,000
- Review a Teachers’ Pay Policy and a Support Staff Pay Policy for approval by the governing board
- Endorse decisions in respect of service agreements and insurance.
- Monitor the impact of the planned spending of the pupil premium and PE and sports premium, and ensure spending is compliant with the funding guidelines

The above delegated responsibilities will be documented in the resources committee’s terms of reference.

The finance team/ external finance support will:

- Control, monitor and evaluate the school's finances, ensuring compliance with financial requirements and regulations.
- Work with and maintain administrative systems, ensuring that maximum efficiency is achieved.
- Provide reports, as requested, on current school accounts to the finance committee and governing board.
- Ensure that orders, invoices and other financial documents are processed according to established procedures.
- Be responsible for checking the accuracy of information and providing regular reports to the headteacher and governing board.
- Be responsible for the financial management system and all financial papers.
- Be responsible for ensuring a list of all assets is maintained.
- Maintain a secure list of all bank and building society accounts and the signatories for each.
- Check monthly bank statements and investigate possible errors.
- Advise the headteacher on matters of financial administration or maladministration.

Other members of staff

Budget holders will be responsible for ensuring that their budgets are managed within agreed procedures.

Both teaching and non-teaching staff will be encouraged to alert the headteacher or governing board if areas of concern arise in respect of the school's financial affairs.

3. Internal Financial Controls

To ensure sound financial control, school monies will be properly monitored in accordance with the requirements of the LA and the principles below:

- The person requiring a product or service will raise an internal order by completing a requisition form
- The budget holder will check the budget and authorise the raised order
- The procurement officer will process the order on the school's finance system – raising a Purchase Order
- The assigned administrators or site team members will sign for the receipt of goods
- Goods received will be checked against each order by the person requiring them / assigned administrator or site team member
- The business support assistant for finance & governance will process the invoice on Access Finance
- The administration and data manager will approve invoices for payment

- The three authorised signatories for authorising BACS payments are the headteacher and the two deputy headteachers
- All BACS payments require two approvers
- Provided that the overall budget allocation is not exceeded, the headteacher may authorise unavoidable expenditure (e.g., energy costs) that exceeds budget allocation; however, they will inform either the governing board or the finance committee at the next available meeting when the variance is in excess of £1,000
- The school will not enter into financial agreements with loan agreements or capital implications without the prior approval of the LA or appropriate body
- Accounting records will be securely stored in accordance with the UK GDPR and the DPA 2018, and only authorised staff will have access to them
- Monies kept in the school will be secured safely in a safe or locked filing cabinet at the smaller sites and not exceed £1,000.

4. Virement

When virements need to be carried out, they will be minuted appropriately and require the following authorisation:

- Virements up to £10,000 – the headteacher, reported to the resources committee
- Virements from £10,000 to £50,000 – the resources committee
- Virements in excess of £50,000 – the governing board

5. Financial Monitoring

When managing its delegated budget, the school will abide by the LA's requirements on financial controls and monitoring.

Income and expenditure will be regularly monitored against the agreed budget for the year, and the headteacher and the Finance Officer/External Finance Support will:

- Carry out a monthly internal monitoring procedure.
- Report on finances to the governing board at termly meetings.

Annual consistent financial reporting returns will be completed and sent to the LA. Annual SFVS returns will be ratified and signed by the governing board prior to submission to the LA. The headteacher and finance team will cooperate with the LA's audit regime.

6. Income

The school is aware of the important financial relationship it has with the LA and the responsibilities and obligations of each party therein. In line with guidance regarding income generation and the basic principle of schools being able to retain income, except in certain specified circumstances, the school will:

- Retain income from lettings of the school premises
- Cross-subsidise lettings for community and voluntary use with income from other lettings, provided the governing body is satisfied that this will not interfere to a

significant extent with the performance of any duties imposed on them by the education acts, including the requirement to conduct the school with a view to promoting high standards of educational achievement.

- Retain income from fees and charges except where a service is provided by the LA from centrally retained funds. The school will have regard to any policy statements on charging produced by the LA in this respect.
- Retain income from fund-raising activities.
- Retain the proceeds of sale of assets, except in cases where the asset was purchased with non-delegated funds, or the asset concerned is land or buildings forming part of the school premises and is owned by the authority.

Any income accrued from the sale of assets purchased with delegated funds will only be spent for the purposes of the school.

The headteacher, finance team/external Finance Support will reconciliate all income and expenditure transactions regularly to ensure that goods and services are being charged and paid for correctly.

All income shall be recorded at the point of receipt in a form approved by the headteacher.

Voluntary and private funds

The school will provide audit certificates in respect of the voluntary and private funds it holds to the LA, and of the accounts of any trading organisations controlled by the school.

- The headteacher shall be the treasurer for all voluntary funds. There shall be an annual audit of these funds. The auditor shall be an independent person appointed annually.
- There shall be two signatories on each cheque
- The audited accounts shall be submitted annually to the Governing Board.
- The voluntary fund accounts shall run completely separately from the school budget account, but shall be subject to the same stringent financial regulations.
- With the introduction of Consistent Financial Reporting (CFR), it is no longer a requirement to account separately for voluntary funds and all expenditure and income relating to the operation of the school should be included with the school's CFR return at the end of the year.
- The Governing Board ensures that any relevant voluntary funds are registered with the Charity commission.
- Any income that relates to the delegated budget should not be credited to a voluntary fund.
- The headteacher should present the audited accounts, the auditor's certificate and a written report on the accounts to the Governing Board as soon as possible after the year end.
- The school business manager will send a copy of the audited accounts to the LA as soon as the Governing Board have accepted them.

- The headteacher ensures that two signatories authorised by the Governing Board sign every cheque drawn on the voluntary fund account. These shall be the headteacher and the administration and data manager.
- All voluntary fund income is banked at least once per term.
- Receipts should be issued for any donations or income entering the voluntary funds.
- The headteacher ensures that the voluntary funds are covered by insurance.
- The headteacher ensures that monthly bank reconciliations between the accounting records and bank statements are undertaken and independently reviewed.

7. Staffing and Payroll

Teachers

The school will appoint staff in accordance with employment law, and follow the requirements set out in the 'School Staffing (England) Regulations 2009'. The school will follow the requirements of the 'School teachers' pay and conditions' (STPCD) statutory guidance when determining the pay and conditions of teachers employed by the school. The school will follow the provisions outlined in the school's Teachers' Pay Policy when managing the contracts of teachers. In accordance with guidance on STPCD, all pay progression at the school is linked to performance. For this reason, all pay progression decisions will first be determined by the school's Appraisal Policy for Teaching Staff and the Capability Policy for Teaching Staff.

Support staff

The school will appoint staff in accordance with employment law, and follow the requirements set out in the School Staffing (England) Regulations 2009. The school will follow the provisions outlined in the school's Pay Policy for Support Staff when managing staff contracts.

For support staff employed at the school, it is the LA who will be the employer. The school is mindful of this fact and is aware of their legal obligations when making decisions regarding the pay and grading of support staff. The school has adopted the provisions of 'The Green Book' for support staff employed at the school. The provisions of this agreement will therefore have a contractual bearing on all support staff contracts.

The headteacher will determine the pay range for all new roles prior to advertising the role, except in relation to new high-level roles. All pay decisions for new high-level roles introduced into the staffing structure will be determined by the governing board following a case proposal from the headteacher. When a new staff member is appointed, the headteacher will determine the starting scale point for the role from within the advertised pay range.

Please refer to the Teachers Pay Policy and Support Staff Pay Policy for more information.

Pensions

The school will ensure that its processes abide by the requirements as outlined by the Teachers' Pension Scheme (TPS) and the Local Government Pension Scheme (LGPS).

Payroll

The payroll provider at name of school is Liberata. The headteacher will sign off the monthly payroll reconciliation reports.

8. Governor Payments

The school will follow the provisions outlined in the school's Governors' Allowances Policy when deciding whether to reimburse governors, and associate members appointed by the governing board, for any expenses they have incurred when serving on the board.

Governors will not be paid for their services to the governing board (unless the Secretary of State believes this is in the best interests of the school following intervention). The school will not refund governors or associate members for any loss of earnings incurred through the attendance of meetings.

The circumstances in which governors may make a claim will be agreed by the chair of governors in advance but will only be for expenditure necessarily incurred to enable the person to perform any governance duty that is beneficial to the school and relevant to their role on the board. Reimbursements will be authorised by the headteacher or chair of governors following submission of a claim form evidenced with receipts.

For more information, please refer to the Governors Allowance Policy.

9. Contracts

The school will follow the provisions outlined in the Local Authority's Finance Regulations when entering into and managing contracts.

The school will seek legal advice where necessary, before entering a contract and ensure it has a contract management plan in place. Non-routine tenders or purchases, such as leases, are subject to a contract, which will be signed before the work begins or goods are delivered.

A meeting will be arranged with the supplier to finalise the management and payment arrangements, clarify key performance indicators, and agree how they will work together.

All contracts will include the following details:

- The scope of the work, including accurate specifications

- The timeline and completion date of the work
- Quality control measures, e.g., regular meetings, compliance with any British Standard specification code
- The agreed fees or charges, including any payment dates or pricing schedule
- Specifications of the goods or service
- An ‘implementation plan’ to outline who is responsible for what
- Any terms and conditions, e.g., terminating the contract
- The exit process
- The requirements for any companies being employed by the supplier
- Indemnity against any claim which may be made in respect of personal injury to any person due to negligence by the school and against any claim for damage due to negligence of the contractor, and the contractor shall provide evidence of insurance against such claims

10. Purchasing

The school will follow the provisions outlined in the Local Authority’s Finance Regulations when purchasing goods and services. In all circumstances the school will ensure that:

- Spending is for the purpose intended and there is probity in the use of public funds.
- Spending decisions represent value for money.
- Internal delegation levels exist and are applied.
- A competitive tendering process is in place and applied, and PCR procurement rules and thresholds are observed.
- Professional advice is obtained where appropriate.

Where possible, the school will use a framework agreement to purchase goods, works or services.

11. Leases

The school will follow the provisions outlined in the school’s Lettings Policy when managing the leasing of the school premises.

The governing board will have overall responsibility for the management of lettings and for determining charges for the letting of the school premises. The school will not enter into lease or purchase agreements without the prior approval of the finance committee.

All lettings fees that are received by the school will be paid into the school’s independent bank account, to offset the costs of services, staffing etc. (which are funded from the school’s delegated budget).

Sub-letting of any kind is strictly prohibited. If the school receives any evidence pertaining to plans to sub-let, all bookings that the hirer has made will be cancelled.
Charges

A charge may be imposed to cover the following:

- Costs of services (e.g., heating and lighting)
- Costs of staffing, including "on-costs" (e.g., additional security or caretaking)
- Costs of administration
- Costs of wear and tear
- Costs of insurance (if the school has arranged its own public liability insurance – see the hire terms and conditions)
- Costs of using the school's equipment, if applicable
- Profit element, if applicable

Where there are multiple lettings taking place at the same time, the costs for services and staffing will normally be shared between the hirers involved.

The charge issued for each letting will be reviewed annually by the Headteacher / governing board, normally taking place in the spring term, for implementation in the beginning of the next financial year, and taking effect from 1 April that year.

12. Assets

The school will follow their internal set procedures when managing the school's assets.

The Administrations and Data Manager will maintain an asset register, which will be regularly reviewed by Governors. The headteacher will use the asset register to ensure the school effectively utilises its assets and plans for replacements, as necessary.

The asset register will record all assets valued £50 or more. This inventory will also register anything that is portable and attractive, e.g., a camera. The register will be checked annually by the headteacher and reported to the resources committee. Annually the resources committee will be provided with a list of disposed items from the register and their total value.

School Premises

The governing board will be clear about who owns the land and buildings from which the school operates, including any leaseholds.

Disposal of Assets

The school will assign the responsibility for asset disposal to a member of staff with a suitable level of authority. The school will try to obtain the best possible value from the disposal of assets, where applicable.

Assets with a carrying amount of above £200 will require approval from the governing board prior to disposal. The write-off and disposal of assets with a value below £1,000 may be authorised by the headteacher. Any items above this value will be referred to the finance committee for approval.

13. Insurance

The headteacher is responsible for liaising with the local authority or the DfE's Risk Protection Arrangement (RPA) for Schools to effect annual insurance arrangements.

The governing board shall consider whether to purchase insurance against risks not covered by the local authority (e.g., staff absence insurance).

The school shall not give any indemnity to any third party without the written consent of the LA (specifically parents working on improvements or repairs on site, equipment borrowed by staff and leaving the premises).

The school shall immediately inform the local authority or its insurers of any accident or loss which may result in an insurance claim.

Security of Cash and Cheques

- All cash and cheque books are kept in the safe or a locked cabinet except when being processed.
- Keys are held by the school business manager, finance officer and office administrator (school fund). Keys for the safe are taken off site or stored in a locked key cabinet every night.
- All cash and cheques shall be securely locked in the safe until banked. The safe has a cash limit of a maximum of £1,000 which is covered as an insurance risk.

14. Banking

When opening and/ or using the school's bank account, the school will:

- Select the most suitable for the school, considering their reputation, location and the accounts that they offer.
- Communicate their decision to the resources committee, who will inform any other relevant members of staff about the decision.
- Ensure that only the necessary members of staff are provided with the school's bank account details.
- Establish the passwords for the bank account and communicate these to the relevant members of staff.
- Decide whether to set an appropriate overdraft limit for the account or make it clear that no overdraft will be permitted.
- Ensure that staff who are permitted to access electronic banking facilities only do so from an approved school-owned device which has the relevant e-security measures installed

The Finance Officer will be responsible for:

- Banking monies.
- Preparing paying-in slips prior to banking.
- Ensure that all deposits and withdrawals are properly documented and receipts are provided.
- Ensuring that significant quantities of money are transported to the bank securely, i.e., not on public transport.
- Ensuring that monies are transferred from the school to the bank in a secure bag or envelope.
- Ensuring that all monies are reconciled with receipts prior to banking.
- Monitoring the bank accounts and ensuring that the accounts are functioning as they should.

With regards to the School's Voluntary Fund account, the above will be completed by the assigned Administrator.

When managing monies and interacting with the bank the following principles will apply:

- Before money can be paid into or withdrawn from the account the Finance Officer/ Headteacher will give approval for the transaction to take place.
- Those with responsibility ensure they vary the days and times that they go to the bank.
- Collections are paid into the bank account promptly and in full. Bank paying-in slips show clearly the split between cash and cheques and list each cheque individually. The total shown on the paying-in slip must agree to the amount on the computerised system.
- Money for banking is taken to the bank to be paid in once a term by two members of staff.
- Most monies are collected by School Gateway which transfers monies directly into the school account fortnightly before being added to the school MIS system in a timely manner.
- Any pending banking, such as cheques, is locked away securely until they are banked.

Staff will not be expected to put themselves in danger when they are banking money – if they are ever in a threatening situation, their first priority should be to keep themselves safe. To ensure security of staff and finances, the school will conduct any relevant risk assessments.

Any banking discrepancies will be immediately reported to the headteacher or the chair of the governing board.

The school currently utilises an RBS procurement account approved and authorised by the local authority with an account limit of up to £20,000.

There is one card on this account, which currently has a limit of £5,000.

The headteacher/ governing board approves the card holders. This is currently the administration and data manager.

- The cardholders are responsible for all transactions on their cards and for keeping receipts to submit with the monthly statements.
- Finance staff are responsible for entering card transactions onto the school's MIS in a timely fashion.
- Monthly records are reconciled along with the bank reconciliation, and full records of transactions are checked by the headteacher.
- Individual purchases are made in line with the limits identified on the Scheme of Delegation (see Appendix 1).

The charge card will be issued and used responsibly. Personal credit cards will not be used for purchasing products for the school. No interest charges will be incurred by the school – the balance will be fully cleared on a monthly basis.

Reconciliation of Online Payments

The school will use online payment systems for all of its expenditure and income transactions, where possible.

The school will ensure transparency about the inflows and outflows of its online finances and that all online banking statements are reconciled appropriately. The school will follow the provisions outlined in the Reconciliation of Online Payments Policy when managing the school's online banking activity.

The school will obtain statements of its online payment transactions. These will be reconciled as soon as they are received and will be checked, signed and dated by the headteacher to evidence that the school's online transactions have been reconciled correctly.

Outstanding payments will be reviewed periodically against the school's banking statements, and commentary will be added to where cash flow problems are caused by outstanding payments. All bank reconciliations will be signed off by the headteacher and countersigned by the SBM or another individual with an understanding of the reconciliation process.

The school will submit a termly finance return to the LA which breaks down the school's expenditure and income transactions, and summarises the school's cash flow position. Appropriate back-up documentation will also be provided.

Reconciliations will be undertaken regularly to avoid any difficulties in balancing the account, and to ensure that discrepancies can be identified and resolved in a timely manner. All discrepancies will be investigated by the headteacher and SBM and will be resolved prior to the next reconciliation.

Staff involved in the school's reconciliation processes will receive adequate training to ensure that they understand how to deal with the reconciliation of online payments.

Payments made to the school will not be held in private bank accounts under any circumstances. The school will reconcile the transfer of all money to the schools' bank account to ensure that the correct amount has been transferred for the correct transaction.

Following the payment for goods or services, the finance officer will ensure that the amount charged is aligned with the agreed price prior to the payment for the item – the school will follow up any discrepancies by contacting its bank and the provider of the item or service.

15. Petty Cash

For the purpose of this section of the policy, "petty cash" refers specifically to the petty cash fund maintained for small purchases. "Cash" generally may also refer to other monies received by the school for other purposes. Cash received for dinner monies and school events shall be held and reconciled separately from the petty cash fund.

All cash will be held securely. To ensure security of staff and finances, the school will conduct a Cash Handling and Bank Visit Risk Assessment which will be reviewed annually. Online accounting systems will be used to maintain financial security as much as possible.

Petty cash held on site is limited to £500 (currently £450 at St Paul's Cray and £50 at Beckenham) and is administered by the finance officer (SPC) or office administrator (Beckenham). Transactions will be kept to a minimum for preapproved minor purchases or staff reimbursements below £10 and the maximum value for one transaction is £30 for small purchases rising to £200 in exceptional circumstances. Petty cash transactions will be counted by two members of staff, the administrating person and another responsible member of staff who is the recipient of the cash in the first instance. The recipient will provide a receipt as an acknowledgement of receiving monies and will be required to obtain VAT purchase receipts wherever possible. Where obtaining a VAT receipt is not possible, such as when making purchases through coin-operated machines, staff members will still log details of the transaction such as the date and time it was made, the name of the vendor, and a description of the goods or services bought. The administrator will ensure any change is returned and signed for and the value of the receipt matches the net expense. The petty cash account shall be reconciled monthly as part of the month end process when the cash in hand is counted by two members of the finance team. Funds shall be withdrawn form the main school account on a half termly basis to return the total amount held to £500.

During school events, petty cash will be collected regularly and stored in the school safe or locked filing cabinet at the smaller sites. Monies will not be kept on site for longer than necessary. Where possible, monies will not be kept on site over the weekend or holidays.

Any cash received in the office (for example dinner monies) will be recorded immediately and where requested, a receipt will be given to the person who delivered the cash and a copy of the receipt is logged.

Post containing monies will be counted by two members of staff and processed using online management systems. If two members of staff are not available, post will be locked in the office safe until a second staff member becomes available.

16. Charging for School Activities

When considering charging for activities, the school will follow the provisions outlined in the Charging and Remissions Policy.

The school will recognise its legal requirements regarding charging for school activities under the Education Act 1996 and will aim to meet all additional guidance provided by the DfE.

17. Pupil Premium

When managing pupil premium allocations, the school will follow the provisions outlined in the Pupil Premium Policy. The school will only spend pupil premium funding in line with the terms outlined within the conditions of grant as outlined below:

- For the benefit of pupils registered at the school
- For the benefit of pupils registered at other maintained schools or academies
- On community facilities whose provision furthers any benefit for pupils at the school

The school will use the PPG to support other pupils with identified needs where appropriate; for example, on pupils who have or have had a social worker or pupils who may be acting as a carer.

The school will decide the activities on which the PPG will be spent in line with the framework and 'menu of approaches' set out by the government in 'Using pupil premium: guidance for school leaders', and focussed on the three areas below:

- High-quality teaching, such as staff professional development
- Targeted academic support, such as tutoring
- Wider strategies to address non-academic barriers to success in schools, such as attendance, behaviour, and social and emotional support

If the school has not spent the PPG within the financial year in which it was allocated, the school will carry the remainder forward to the following financial year. When carrying PPG funding forward, the school will continue applying the above criteria.
The headteacher will report annually to the governing board and parents regarding how

effective PPG spending has been and what impact has been made. The impact of PPG spending, in terms of improving educational outcomes and cost effectiveness, will be monitored, evaluated, and reviewed by the headteacher and the governing board.

Information regarding PPG spending will be published on the school website.

18. PE and Sport Premium

The governing board will ensure that the PE and sport premium is spent in accordance with the provisions laid out within ESFA's 'PE and sport premium conditions of grant' document. The school will use the grant to:

- Develop or add to the PE, physical activity and sports activities that the school already offers.
- Build capacity and capability within the school to ensure that improvements made now will benefit pupils joining the school in future years.

In accordance with the conditions of grant, the school will publish online:

- The school's PE and sport premium allocation for the current academic year.
- A full breakdown of how it has been spent.
- The impact that the school has seen on pupils' PE and sport participation and attainment because of the premium.
- How improvements in PE and sports participation and attainment will be sustained.
- The percentage of pupils within the Year 6 cohort who have met the national curriculum requirement to:
    - Swim competently, confidently and proficiently over a distance of at least 25 metres.
    - Use a range of strokes effectively.
    - Perform safe self-rescue in different water-based situations.

The school will not spend the grant on the following:

- Employing coaches or specialists to cover PPA arrangements
- Teaching the minimum requirements of the national curriculum (except for top-up swimming lessons after pupils' core lessons)
- Transport to the national curriculum swimming lessons
- Funding capital expenditure

19. School Forums

The governing board and the headteacher will cooperate with the LA with the election of members to the school's forum. The governing board and the headteacher will, where it is within their limits, cooperate with any direction from the school's forum, in relation to the expenditure of the school budget.

20. Conflicts of Interest

All staff and volunteers will be able to demonstrate that they do not have a vested interest in any decision-making or budget spending, remain objective and act within the best interests of the school and its pupils.

Members of the governing board will declare any conflicts of interest at an early stage and inform the relevant people, e.g., the headteacher. Members of the governing board will ensure that any conflicts of interest do not prevent them from making a decision that would be in the best interests of the school and its pupils.

Members of the governing board and the relevant members of staff will declare the following interests:

- Holding another public office
- Being an employee, director, adviser or partner of another business or organisation
- Pursuing business opportunities
- Being a member of a club, society or association
- Having a legal or professional obligation to someone else
- Having a beneficial interest in a trust
- Owning or occupying a piece of land
- Owning shares or some other investment or asset
- Having received a gift, hospitality or other benefit from someone/an organisation
- Owing a debt to someone/an organisation
- Holding or expressing strong political or personal views that may indicate prejudice or predetermination for or against a person or issue
- Being a governor, associate member or trustee at any other educational establishment
- Being a spouse, partner, relative or close friend of someone who has one of these interests

All interests and connections that could influence the school's reputation with the public will be declared.

Staff and volunteers that have a relative whom they know to have a declarable interest will declare this information. Only relevant interests will be declared, e.g., the spouse of the owner of a catering service when the school is seeking a new catering company. Any interests that do not directly benefit individuals or their relatives will not need to be declared, e.g., being a small shareholder in a large national company rather than a significant shareholder.

The school will follow the provisions outlined in the Conflicts of Interest Policy to ensure that the decisions and decision-making processes at the school are, and are seen to be, free from personal bias and do not unfairly favour any individual or company connected with the school.

21. Preventing Fraud and Corruption

Employees and individuals working for the school at all levels (whether permanent, fixed-term or temporary), including governors, volunteers, agents and any other persons associated with the school, will be expected to act with high levels of integrity and adhere to the rules outlined in the Anti-fraud and Corruption Policy. Fraud and corruption will be minimised through effectively designed and consistently implemented management procedures which deny opportunities for fraud and corruption.

The headteacher will assess the areas of the school that are most vulnerable to fraud on a termly basis. Fraud risks will be identified for all areas and processes of the school and assessed in terms of impact (including monetary and non-monetary) and the likelihood of occurrence. Robust internal controls will be implemented to manage the risk of fraud, covering the following areas:

- Approval and authorisation process of transactions
- Access restrictions and transaction controls
- Account reconciliations
- Physical security of assets
- Segregation of responsibilities
- Pre-employment checks

All new employees will be familiarised with the Staff Code of Conduct and required to follow it at all times. Recruitment will be conducted in line with school policy and all new employees will be required to declare any business or pecuniary interests, and any other conflicts of interest.

Following a case of fraud or irregularity, the risk management strategy will be reviewed to ensure it considers all relevant risks and is effective.

22. Gifts and Hospitality

The school will advise staff to consider, in all circumstances, whether offered gifts or hospitality are reasonable and justified and to reflect on the intention behind it. It will be unacceptable for employees to:

- Give, promise, or offer a payment, gift or hospitality with the expectation or hope that they or the school will receive an advantage.
- Give, promise, or offer a payment, gift or hospitality to reward an advantage they or the school have already received.
- Give, promise, or offer a payment, gift or hospitality to a government official, agent or representative to facilitate or expedite a routine procedure.
- Accept payment from a third party if they know or suspect that it is offered with an expectation of a business advantage in return.
- Threaten or retaliate against another employee who has refused to commit a bribery offence or who has raised concerns under this policy.

- Engage in any activity that may lead to a breach of school policy.

This policy will not prohibit normal and appropriate gifts and hospitality, both given and received, if the following requirements are met:

- It is not given with the intention of:
  - Influencing a third party to obtain or retain business or a business advantage.
  - Rewarding the provision or retention of business or a business advantage.
- It is not given in exchange for favours or benefits.
- It is given in the school's name, not in the individual's name.
- It complies with local law.
- It does not include cash or a cash equivalent, e.g., vouchers or gift certificates.
- It is appropriate in the circumstances, e.g., the giving of small gifts at Christmas.
- The type and value of the gift or hospitality is reasonable based on the reason it is offered.
- It is given openly, not secretly.

Gifts and hospitality should not be offered to, or accepted from, government officials or representatives without the prior approval of the SBM. The Gifts, Hospitality and Anti-bribery Policy and the school's Gifts and Hospitality Register outline the school's procedures on the acceptance of gifts, hospitality, awards, prizes, and other benefits that could compromise the judgement or integrity of the school or its staff.

23. Financial Irregularities

The governing board and the headteacher will ensure all staff are informed of the school's policies and procedures related to fraud and theft, the controls in place to prevent fraud and theft, and the implications of breaching those controls. This information will be provided to new staff and governors upon their induction and individuals will be informed of any changes to the school's policies and procedures.

The responsibility for the prevention and detection of fraud rests primarily with governors and the SLT, but all staff will recognise that robust financial management forms a key part of the school's values and culture, and that they should actively support those values and culture by:

- Encouraging senior leaders to recognise and consider their financial management responsibilities.
- Being vigilant to the signs of financial irregularity.

All members of staff will be aware of the school's Whistleblowing Policy and will be encouraged to come forward if they have any concerns regarding financial management or financial propriety.

Any member of staff suspecting the occurrence of financial irregularity or fraud will notify the headteacher, who will advise on the appropriate action to be taken or investigate the matter; however, if it is the headteacher that is suspected of malpractice or financial irregularity, then staff must contact the chair of governors instead.

The school will cooperate with LA monitoring of school finances and will work with them to attempt to resolve any issues before formal action becomes necessary.

24. Retention of Records and Data Protection

Any financial records created as a result of the school's activities will be managed in line with the school's Data Protection Policy and Records Management Policy. Financial records will be stored, retained, and disposed of in accordance with the retention schedules detailed in the Records Management Policy. Data will not be kept for longer than is necessary. Paper documents will be shredded or pulped, and electronic memories scrubbed clean or destroyed, once the data should no longer be retained.

- The school will ensure that it is registered under the Data Protection Act 1984and the UK General Data Protection Regulations.
- The administrator should ensure that back-up disks are stored separately from the school office/ data storage or that there is a remote back up service and disaster recovery plan in place.
- Only authorised staff should have access to the hardware and software used for school management.
- All personnel and payroll files are kept securely in a lockable cabinet in a room that is locked when not occupied.
- Financial, payroll and pension records should be kept in line with the Information and Records Management Society of the UK "Schools Toolkit".
- Any data breach will be notified to the data protection officer for advice on reporting to the Information Commissioner in line with our Data Breach Policy guidelines.

25. Monitoring and Review

The governing board will review this policy on an annual basis in collaboration with the headteacher, who is responsible for communicating any changes to all members of staff.

Appendix 1 – Finance Responsibilities

	Governing Board	Resources Committee	Head Teacher	Finance Support	Administration and Data Manager	Finance Officer	Proc. Officer	Business Support Assistant	Site / Facilities Manager	Account Holder
1. BUDGET										
Setting annual budget	X									
Creating Annual budget		X	X	X		X				
Agree budget share with LA			X	X						
Monthly budget monitoring		X	X	X		X				
Termly budget monitoring	X			X						
Termly reporting to FGB		X	X	X						
Creating monthly budget statements				X						
Annual Review of SPD priorities		X	X			X				
Financial Forecast			X	X		X				
Virement of Budgets	X(Over 50k)	X(£10k- £50k)	X(Up to £10k -)	X(under 5k)						
2. INTERNAL CONTROLS										
Agree purchases			X	X		X				X
Place Orders					X (as nec.)		X	X Agency & Key contracts		
Authorise Orders			X	X		x				
Receive & check orders					X		X And Admin at smaller sites		X	
Chase outstanding goods					X		X	X		
Report/return damaged/faulty goods					X		X			

	Governing Board	Resources Committee	Head Teacher	Finance Support	Administration and Data Manager	Finance Officer	Proc. Officer	Business Support Assistant	Site / Facilities Manager	Account Holder
Authorise payment orders			**X**	**X**		X				
Make payments						**X**				
Authorised signatories			**X**	**X**		**x**				
Reconciliation				**X**		**X**				
Termly reconciliation				**X**						
Check correct coding on FMS				**X**		**X**	**X**	X		
Ensure regular back up of data					**X**					
Security of data/data protection				**X**	**X**	X	X	X		
3. INSURANCE										
Annual insurance			**X**	**X**				X		
Additional insurance		**X**				X		X		
Notification of losses inc. absence					**X**				**X**	
4. PURCHASING										
Ensuring Value for money		**X**	**X**	**X**	**X**	**X**	**X**			
Obtaining quotes-Projects(over £5K)				**X**	**X**		**X**		**X**	
Authorising expenditure	**X(Over £100k)**	**X (£10k -- £100k)**	**X(Up to £10k)**	**X<£5,000**						
Capital spending from budget shares	**X(£10k - £15k)**		**X(Up to 10k)**							
5. PERSONNEL										
Processing Information					**X** (& Personnel Officer / HR Manager)	**X**	**X (as nec.)**			
Payments			**X**	**X**	**X** (& Personnel Officer/HR					

	Governing Board	Resources Committee	Head Teacher	Finance Support	Administration and Data Manager	Finance Officer	Proc. Officer	Business Support Assistant	Site / Facilities Manager	Account Holder
					Manager)					
Monthly checks			**X**	**X**						
Review salaries		**X**	**X**							
DBS Checks				**X**	(Personnel Officer only)					
6.SECURITY OF STOCK										
Maintenance of Stock							**X**		**X**	**X**
Inventory of Stock (annual check)			**X**							
Security Marking					**X** (Admin Officer & ICT Tech)				**X**	
Maintenance of Items Off-Site List					**X** (Admin Officer & ICT Tech)					
Physical Security of Site (and Keys)									**X**	
Write off obsolete items		**X**	**X(rep.value<£2.5k)**							
Write off debt	**X**		**X,£1K**							
Disposals in accord with financial regs.	**X**	**X**	**X**							
7. INCOME										
Charging Policy		**X**								
Charging/accounting				**X**						
Receipt of income					**X** (Admin Officer for School Fund)	**X**				
Reconciliation				**X**	**X** (Admin Officer for	**X**				

	Governing Board	Resources Committee	Head Teacher	Finance Support	Administration and Data Manager	Finance Officer	Proc. Officer	Business Support Assistant	Site / Facilities Manager	Account Holder
					School Fund)					
Banking				**X**	**X** (Admin Officer for School Fund)	**X**	**X**	**X**	**X**	
Security of income				**X**	**X** (Admin Officer for School Fund)					
8. BANKING ARRANGEMENTS										
Banking				**X**	**X** (Admin Officer for School Fund)	**X**		**X**	**X**	
Records and reconciliation				**X**	**X** (Admin Officer for School Fund)			**X**		
9. VOLUNTARY FUNDS										
Treasurer/ Arranging Annual Audit				**X**						
Accounting, monitoring & reconciliation				**X**	**X** (Admin Officer for School Fund)					
Annual Oversight	**X**			**X**	**X** (Admin Officer for School Fund)					
Approval/authorising expenditure			**X**	**X**						**X**
10. PETTY CASH										
Handling, Accounting, Security						**X (£500 max)**	**X (£500 max)**			
Authorising re-imbursement over £10			**X**	**X**						

Appendix 2 – Scheme of Delegation

Scheme of Delegation / Authorised Signatories – 2026-2027

The following persons are authorised signatories for this school with effect from 01.04.2026 (or start date if after this date)

Name of Certifying Officer		Position	Specimen Signature (initials and signature)	*Orders*	*Financial Limit of Ordering*	*Invoices*	*Cheques*	*Staffing Documents (Payroll)*	*Virement Between*	*Financial Limit of Virement Authority*	*Procurem ent/Char*	*Cost Centre(s) or Ledger Code(s)*
Surname	**First Name**											
Christian	**George**	On behalf of FGB/RC		***Nil***	***£10-100k***	***Nil***	***Nil***	***Nil***	***Yes***	***£50-100k (FGB) £10-50k (RC)***	***Nil***	*All.*
Steve	**Solomons**	Head Teacher		***Yes***	***£10k***	***Yes***	***Yes***	***Yes***	***Yes***	***£10k***	***Nil***	*All and where Governors at the RC/FGB have agreed works to take place exceeding the £10k delegated amount. Minutes to be attached or referenced to orders/invoices where possible.*
Tracy	**De Freitas**	Administration and Data Manager		***Yes***	***£1k***	***Yes***	***Yes***	***No***	***No***	***Nil***	***£1k***	*Admin Stationary / Admin Postage / Admin Furniture / Admin Hospitality (school functions) / ICT. Subscriptions and some leases, Telephony, Food Budget*
Aileen	**Thomas**	Finance Officer		***Yes***	***£1k***	***Yes***	***Yes***	***Yes – Payroll Rec only***	***No***	***Nil***	***£2.5k***	*All with HT approval. Main HSBC / Barclays account only*
Amy	**Price**	Deputy Headteacher		***Yes***	***£5k***	***No***	***No***	***No***	***No***	***Nil***	***Nil***	*All Phase Budgets, Pupil Premium/CLA, Whole School*

												Initiatives/Resources, First Aid / Medical. CPD. Subscriptions. Sensory. All only in the Headteachers' absence.
Charlotte	**Downs**	Deputy Headteacher		***Yes***	***£5k***	***No***	***No***	***No***	***No***	***Nil***	***Nil***	*All Phase Budgets, Pupil Premium/CLA, Whole School Initiatives/Resources, First Aid / Medical. CPD. Subscriptions. Sensory. All only in the Headteachers' absence.*
Clare	**Collett**	Assistant Headteacher		***Yes***	***£1k***	***No***	***No***	***No***	***No***	***Nil***	***Nil***	*Secondary Phase Budget, Pupil Premium/CLA, Whole School Initiatives/Resources. Subscriptions. Sensory. Jack Petchy. Lounge. CPD*
Helen	**Bushell Movahedi**	Assistant Headteacher		***Yes***	***£1k***	***No***	***No***	***No***	***No***	***Nil***	***Nil***	*Secondary Phase Budget, Primary - Beckenham Phase Budget only, Pupil Premium/CLA, Whole School Initiatives/Resources. Subscriptions. Sensory. Lighthouse Club. CPD*
Daniela	**Costanza**	Assistant Headteacher		***Yes***	***£1k***	***No***	***No***	***No***	***No***	***Nil***	***Nil***	*Primary Phase Budget (WW,RP, SPC), Pupil Premium/CLA, Whole School Initiatives/Resources. Subscriptions. Sensory. CPD*
Catherine	**Collett-Strutt**	Assistant Headteacher		***Yes***	***£1k***	***No***	***No***	***No***	***No***	***Nil***	***Nil***	*Secondary Phase Budget (WW,RP, SPC), Pupil Premium/CLA, Whole School Initiatives/Resources. Subscriptions. Sensory. Happy Café.*
Lucy	**Godley**	Phase Leader		***Yes***	***£500***	***No***	***No***	***No***	***No***	***Nil***	***Nil***	*Phoenix Phase Budget. Whole School Communication tools/ subscriptions/initiatives.*
Lauren	**Colegate**	Phase Leader		***Yes***	***£500***	***No***	***No***	***No***	***No***	***Nil***	***Nil***	*Primary Phase budget for allocated site.*

Emily	**Morris**	Phase Leader		***Yes***	***£500***	***No***	***No***	***No***	***No***	***Nil***	***Nil***	*Whole School Sensory / Physio resources.*
Laura	**Stevens**	Phase Leader		***Yes***	***£500***	***No***	***No***	***No***	***No***	***Nil***	***Nil***	*Primary Phase budget for allocated site.*
Claudia	**Crack**	Phase Leader		***Yes***	***£500***	***No***	***No***	***No***	***No***	***Nil***	***Nil***	*Primary Phase budget for allocated site.*
Melissa	**Benton-Lavers**	Ext. Services Manager		***Yes***	***£1000***	***No***	***No***	***No***	***No***	***Nil***	***Nil***	*Extended Services Budget, Club agency cleaning operatives and Teaching Assistants*
Chantal	**Cook**	Head of Expressive Arts		***Yes***	***£500***	***No***	***No***	***No***	***No***	***Nil***	***Nil***	*Expressive Arts budget*
Raymond	**Little**	Facilities Manager		***Yes***	***£5000***	***No***	***No***	***No***	***No***	***Nil***	***Nil***	*Facilities related budget areas, Health and Safety, Pool related orders, reactive maintenance and planned maintenance*
Other Finance Processers												
Jane	**Rumsey**	Administrator (SPC)		*Voluntary Fund Account*								
Bernadette	**Ogg**	Administrator (Beckenham)		*Petty Cash*								
Toni	**Power**	Procurement Officer		*Not applicable*								
Caroline	**Nicol**	Business Support Assistant		*Insurance Claims, Petty Cash.*								
Sheena	**Jones**	Administrator		*Assets, Minibuses, Tesco, Morrisons, Booker, deliveries*								
Louise	**Leonard**	Administrator		*Deliveries*								

Dionne	**Goode**	Administrator		*Deliveries*
Vanessa	**Grant**	Administrator		*Deliveries*

Below are additional Items for the Headteacher (and or staff acting up in his absence)

Item	Amount	Note
Quotes	£5,000	Above £5,000 to £100,000 needs RC approval (3 quotes) Above £100,000 needs to be tendered
Writing off debt	£1,000	Up to £1K Headteacher (each transaction no more than £100) Fed back to Govs (each transaction more than £100)
Disposal of equipment	£2,500	Up to £2.5k Headteacher Fed back to Govs (plus £2.5k+ approved by Governors)
Petty Cash	£500	The amount on site should not exceed this. £30 petty cash limit per transaction could be more extended services "except for the Extended School provision
Gifts	£50	Any gifts or activities in kind exceeding this amount must be recorded on the gifts register and reported to Govs
Safe	£1,000	Cash limit (£500 in each safe)

Authorised by Governing Board: .... **Date: May 2026**