

FINANCIAL REGULATIONS PROCEDURE

Introduction

The purpose of this document is to describe the financial policies and procedures of Newbattle Abbey College.

Observation of the Regulations and adherence to the Procedures are mandatory for all those employed by the College. This is to ensure that all the College's financial matters are managed to the highest professional standards and in accordance with best current practice and, more specifically, that there is compliance with the terms of the financial memoranda which are agreed from time to time between the College and SFC.

This document is issued under the authority of the Board of Directors of Newbattle Abbey College (hereinafter referred to as "Board"). The Regulations and Procedures may be amended only with the consent of the Board.

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1 Background

The framework within which the College's affairs must be managed is substantially set out in the Articles of Association. The College's Board of Directors has ultimate responsibility for the effective management of the college and for planning its future development.

The College is a company limited by guarantee with charitable status.

The financial memoranda agreed from time to time between the Scottish Funding Council (SFC) and the College set out the terms and conditions upon which grant is made. The Board is responsible for ensuring that conditions of grant are met. As part of this process the College must adhere to SFC's audit code of practice which requires it to have sound systems of financial and management control. The financial regulations, which follow, form part of this overall system of accountability.

2 Status of Financial Regulations and Procedures

This document sets out the College's financial regulations and procedures. It translates into practical guidance the College's broad policies relating to financial control. It applies to the College and all future subsidiary undertakings.

These financial regulations are subordinate to any restrictions contained within the financial memoranda agreed from time to time between the College and SFC and to SFC's audit code of practice.

Compliance with the financial regulations is compulsory for all staff connected with the College. A member of staff who fails to comply with the financial regulations may be subject to disciplinary action under the College's disciplinary policy. Any such breach will be notified to Board through the Audit and Risk Committee. It is the responsibility of the Senior Management Team to ensure that staff are made aware of the existence and content of the College's financial regulations and that an adequate number of copies are available for reference.

3 Financial Control

3.1 Board of Directors

The Board of Directors has ultimate responsibility for all the affairs of the college. Its financial responsibilities include:

- The effective and efficient use of resources, the solvency of the college and the safeguarding of its assets.
- The approval of annual budget including estimates of income and expenditure. The Board shall ensure that the college adheres to the funding requirements specified in funding agreements including, but not limited to, the Scottish Funding Council Financial Memorandum.
- The establishment of a Remuneration Committee, as specified in the Financial memorandum, to agree the pay and conditions of senior staff, including the Principal.
- Approval of the appointment of external and internal auditors.

- Approval and monitoring of the strategic risk register.
- Approval of audited annual accounts.

The Board has established committees to assist it in delivering its responsibilities and to make recommendations to the Board with respect to those responsibilities, in line with the Scheme of Delegation. These committees include the Audit and Risk Committee, the Finance and Resources Committee and the Remuneration Committee.

3.2 Committee Structure

3.2.1 Audit & Risk Committee

The Audit & Risk Committee provides advice and sources of assurance to the Board on the adequacy and effectiveness of the College Risk Management systems and the procedures for external and internal audit, financial control and governance. Its financial responsibilities include:

- Recommend to the Board the appointment (and, if necessary, termination of the appointment) of external auditors, their terms of engagement and remuneration.
- Oversee external audit services
- Oversee the relevant policies and systems with the potential to put the College's strategic objectives at risk, including policies and systems for financial control.
- To oversee and monitor those risks identified as being pertinent to the Audit & Risk Committee.
- To advise the Board on its compliance with corporate governance requirements, good practice guidance and the Scottish Funding Council Financial Memorandum and to review and recommend the Statement of Corporate Governance.
- Provide an Annual Report to the Board that the Annual Accounts present a fair, balanced and understandable assessment of the College's position and prospects.

3.2.2 Finance & Resources Committee

The Finance & Resources Committee provides advice and assurance to the Board that the College has appropriate strategies, plans, budgets and controls in place regarding the resources of the College; people, financial, estates and IT infrastructure. Its financial responsibilities include:

- Monitor and oversee the financial management of the College including recommending the annual budget and the financial forecast review (FFR) to the Board;
- Monitor and oversee the management accounts and oversee the delivery of the budget. Conduct regular reviews of actual and forecast income and expenditure and advise the Board on the projected end of year outcome;
- Oversee the Financial Plan and monitor associated Key Performance Indicators (KPIs);
- Keep under review relevant Key Performance Indicators (KPIs) and associated data ensuring the Board is kept informed about progress, or otherwise;
- Approve procurements (over £181,302);

- Approve and oversee the Fee Policy;
- Oversee the commercial strategy of the College and recommend any action to the Board; and
- Provide an annual report of Committee business and activity to the Board.

3.2.3 Remuneration Committee

The Remuneration Committee is responsible for recommending to the Board the remuneration, terms and conditions, and performance objectives of the College Principal and Chief Executive and members of the Senior Management Team. The Committee also has responsibility for the consideration, recommendation, and approval of, any severance packages being offered by the College. If required, the Committee advises the Board on pay policy for all staff in the organisation, having regard to public sector pay policy as set by Scottish Ministers and National Pay Bargaining.

The committee also has the following responsibilities:

- Consistent with the Financial Memorandum, the Committee will recommend to the Board the provisions of any severance schemes and approve the terms of individual settlements, seeking consent where required from the Scottish Funding Council.
- Assist the Board demonstrate efficient and effective use of public funds and overall affordability in decision making so they reflect the performance of the organisation and the need for financial sustainability.

3.2.4 Principal and Senior Management Team

The Principal, as Chief Executive of the College, has delegated responsibility for the operational management of the College subject to strategic and policy direction by the Board and the terms of any specific authority reserved to the Board. The Principal may in turn delegate tasks as appropriate to staff, including members of the senior management team.

The Principal's delegated responsibilities for financial management include:

- taking personal responsibility for ensuring the proper and effective operation of financial, planning and management controls, and for giving effect to the Board's policies for securing the efficient, economical and effective management of all the College's income, assets and expenditure. This includes agreeing Board approved budgetary limits.
- act at all times in compliance with the Financial Memorandum, Conditions of Grant, Scottish Public Finance Manual and to follow the College's Financial Regulations, taking particular account of the delegated financial limits.
- report to the Scottish Funding Council should the Board adopt a policy or commission an action which is incompatible with the terms of the Financial

Memorandum or the Scottish Public Finance Manual, or which would infringe on the requirements of propriety or regularity, and report to the Board in writing on such matters being considered and advise the Board that, should it wish to choose to continue with the policy or action, then as Accounting Officer he or she must report the Board's intentions to the Scottish Funding Council in writing.

The Principal may in turn delegate tasks as appropriate to staff, including members of the senior management team, including, with respect of financial management, the Director of Operations.

3.3 Audit Requirements

3.3.1 External Audit

The Board is responsible for the appointment of the College's external auditors on the recommendation of the Audit & Risk Committee. The Appointment shall be for a specified period after which consideration shall be given by the Audit and Risk Committee to competitively tendering the service.

The primary role of external audit is to report on the College's financial statements and to carry out such examination of the statements and underlying records and control systems as are necessary to reach their opinion on the statements and to report on the appropriate use of funds. The duties of external audit will be in accordance with advice set out in SFC's audit code of practice and the Auditing Practices Board's auditing standards.

The Director of Operations is responsible for drawing up a timetable for the purpose of finalising annual accounts and will advise staff and the external auditors accordingly. The annual accounts will be reviewed by the Audit and Risk Committee. On the recommendation of the Committee, they will be submitted to the Board for approval.

3.3.2 Internal Audit

The Board, on advice from the Audit and Risk Committee, is responsible for the appointment of Internal Auditors. The Audit and Risk Committee will also make recommendations for ad hoc reviews throughout the year if considered necessary.

3.3.3 Discovery of Fraud or Financial Irregularity

Whenever any matter arises which involves, or is thought to involve, irregularities or fraud concerning cash, stores or other property of the College or any other suspected irregularity in the exercise of the activities of the College, staff must notify the Director of Operations immediately who will take such steps as considered necessary by way of investigation and involvement of internal audit.

3.4 Responsibilities

3.4.1 The Principal

The Principal is the College's designated accounting officer and has overall responsibility for the College's financial management.

3.4.2 The Director of Operations

The Director of Operations is responsible for the day to day financial management of the College. The Director of Operations is responsible to the Principal for:

- preparing annual capital and revenue budgets and financial plans;
- preparing accounts, management information, monitoring and control of expenditure against budgets and all financial operations;
- preparing the College's annual accounts and other financial statements and accounts which the College is required to submit to other authorities;
- ensuring the College maintains satisfactory financial systems; and
- providing professional advice on all matters relating to financial policies and procedures

3.5 Budgeting

3.5.1 Resource Allocation

Resources are allocated annually by the Board on the recommendation of the Finance & Resources Committee. The Principal and senior management team are responsible for the effective and efficient use of resources allocated.

3.5.2 Budget Preparation

The Principal is responsible for preparing annually a revenue budget and capital programme for consideration by the Finance & Resources Committee before submission to the Board. The budget should also include cash flow forecasts for the year and a projected year-end balance sheet. The Principal must ensure that detailed budgets are prepared in order to support the resource allocation process and that these are communicated to the budget holders and college managers as soon as possible following their approval by Board.

Should a revision to the budget be required during the year, the Principal is responsible for submitting revised budgets to the Finance and Resources Committee for consideration before submission to Board for approval.

3.5.3 Capital Programmes

The Principal is responsible for providing regular statements concerning all capital expenditure to the Finance & Resources Committee for monitoring purposes.

Following completion of a capital project, a final report should be submitted to the Finance & Resources Committee recording actual expenditure against budget and reconciling funding arrangements where a variance has occurred.

3.5.4 Financial Planning

The Principal is responsible for:

- preparing annually a rolling financial plan for approval by the Board on the recommendation of the Finance & Resources Committee.
- preparing financial forecasts for submission to SFC

Financial plans should be consistent with the strategic plans and estates strategy approved by the Board.

3.5.5 Budgetary Control

The control of income and expenditure within an agreed budget is the responsibility of the designated budget holder who must ensure that day to day monitoring is undertaken effectively. Each budget holder is responsible for the income and expenditure appropriate to their budget and will be assisted in this duty by management information provided by the Director of Operations.

Significant departures from agreed budgetary levels of income and/or expenditure must be reported immediately to the Director of Operations by the budget holder concerned and, if necessary, corrective action taken.

The annual budget is discussed with budget holders, reviewed by the senior management team and Finance & Resource Committee, before final approval by the Board.

The Principal is responsible for supplying budgetary reports on all aspects of the College's finances to the Finance & Resource Committee on a basis determined by that Committee. These reports are presented to Board.

3.5.6 Scottish Funding Council (SFC) - Financial Forecast Return (FFR)

A Call for Information requesting financial forecasts for colleges is normally received from the SFC in June. The Principal is responsible for the preparation of the FFR, which is reviewed at Finance & Resources Committee and approved by the Board.

3.5.7 Virement

Virement will be permitted on approval from the Principal.

3.6 Accounting Convention

The financial statements will be prepared and in accordance with the Statement of Recommended Practice on Accounting in Further Education Institutions, together with such other approved accounting standards as are applicable, and in accordance with accounting policies agreed by the Audit and Risk Committee, from time to time.

3.7 Accounting Returns

The Principal is responsible for consolidating and despatching financial returns and other periodic financial reports to SFC and other agencies as required.

3.8 Accounting Records

The Director of Operations is responsible for the retention of financial documents. These should be kept in a form acceptable to the relevant authorities.

The College is required by law to retain documents for six years. These include:

- Official orders
- Paid invoices
- Accounts raised
- Bank statements

- Copies of receipts
- Paid cheques
- Part time lecturer contracts
- Research grant awards and research contracts
- Complete paper record transactions for each year from the computerised accounting system

Additionally, for auditing and other purposes, other financial documents shall be retained for three years.

4 Treasury and Banking

4.1 Appointment of Bankers

Board is responsible for the appointment of the College's bankers on the recommendation of the Finance & Resources Committee. The Appointment shall be for a specified period after which consideration shall be given by the Finance and Resources Committee to competitively tendering the service.

4.2 Banking Arrangements

The Director of Operations is responsible for liaising with the College's bankers in relation to the College's bank accounts. Cheques and all other banking stationery and software shall be ordered on the authority of the Director of Operations who shall make proper arrangements for their secure custody and operation.

Bank accounts dealing with the College's funds can only be opened or closed on the authority of Board on the recommendation of the Finance & Resources Committee. All bank accounts shall be in the name of the College Board or one of its subsidiary companies. The College's bankers shall be instructed by the Director of Operations not to open accounts in the College's name, other than those where the Board has mandated them to do so.

Cheques shall require two signatures from the list authorised in the mandate, one of whom shall be a member of the senior management team. Electronic banking services shall be operated under the same levels of authority, and shall be sufficient printed output signed as evidence of that exercise of that authority.

The Finance Officer is responsible for ensuring that all bank accounts are subject to regular reconciliation and that large or unusual items are investigated as appropriate.

4.3 Treasury Management (Investments and Borrowings)

The Finance & Resources Committee is responsible for setting out for approval by the Board a treasury management policy statement providing a strategy and policies for cash management, long term investments and borrowing. The Finance & Resources Committee has a responsibility to ensure implementation, monitoring and review of such policies.

All executive decisions concerning borrowing, investment or financing (within policy parameters) shall be delegated to the Principal and an appropriate reporting system set

up. All borrowing shall be undertaken in the name of the College Board and shall conform to any relevant SFC requirements.

The Principal will report to the Finance & Resource Committee no less than twice in each financial year on the activities of the treasury management operation and on the exercise of treasury management powers delegated to him/her.

5 Income

5.1 General

The Director of Operations is responsible for ensuring that appropriate procedures are in operation to enable the College to receive all income to which it is entitled. All receipt forms, invoices, tickets or other official documents in use must have the approval of the Director of Operations.

The Finance Office is responsible for the prompt collection, security and banking of all income received.

The Director of Operations is responsible for ensuring that all grants notified by SFC and other bodies are received and appropriately recorded in the College's accounts.

5.2 Invoicing

Invoices shall only be raised when a Request to Invoice is sent by email to the Invoices mailbox. The Finance Officer creates the invoice and sends back to requestor who checks and forwards onto the client/donor.

5.3 Cash Receipts

All monies received by staff from whatever source must be passed immediately to the Finance Officer.

Personal or other cheques must not be cashed out of money received on behalf of the College.

5.4 The Collection of Debts

The Finance Officer should ensure that

- debtors invoices are raised promptly in respect of income due to the College
- debtors are raised on official College invoices
- swift and effective action is taken to collect overdue debts in accordance with the Procedures detailed below.
- outstanding debts are monitored and reports are prepared for managers.

The Director of Operations is responsible for implementing credit arrangements and indicating a period in which different types of invoices must be paid. Such credit arrangements must be approved by the Principal, as must any subsequent changes thereto.

Overdue debts detailed process:

- Issue a statement as soon as invoice becomes overdue.

- Issue a secondary statement with a letter noting that payment is overdue and requesting contact immediately.
- Issue a formal letter requesting payment within 7 days or the matter will be passed to lawyers.
- Refer collection to lawyers.

Recommendation to write off bad debts up to £1,000 will be made by the Director of Operations to the Senior Management Team. Bad debt over £1,000 will be included in the Director of Operations report to Finance and Resources Committee for discussion.

5.5 Student Fees

The procedures for collecting tuition and residence fees must be approved by the Director of Operations in consultation with the Senior Administrator. They are responsible for ensuring that all student fees due to the College are received.

Where a student who owes residential fees fails to meet agreed payment deadlines, the Senior Management Team will normally withdraw the student from the residences.

Where a student who owes tuition fees fails to meet agreed payment deadlines, the Senior Management Team will normally withdraw the student from the Course.

5.6 Gifts, Benefactions and Donations

The Director of Operations is responsible for maintaining financial records in respect of gifts, benefactions and donations made to the College and reviewing claims for recovery of tax where appropriate.

6 Research Grants and Contracts

6.1 Additional Payments to Staff

Any proposal which involves additional payments to members of staff should be supported by a schedule of names and values and must be approved by the Principal, and in the case of the Principal, by the Remuneration Committee.

6.2 Intellectual Property Rights and Patents

6.2.1 General

Certain activities undertaken within the College including research and consultancy may give rise to ideas, designs and inventions which may be patentable. These are collectively known as intellectual property.

6.2.2 Patents

The Board is responsible for establishing procedures to deal with any patents accruing to the College from inventions and discoveries made by staff in the course of their research.

7 Expenditure

7.1 General

The Director of Operations is responsible for making payment to suppliers of goods and services to the College.

7.2 High Value Orders

Expenditure on a single item or bulk orders of value in excess of £500.00 must have the approval of the Director of Operations or another member of the Senior Management Team before the order is placed.

7.3 Petty Cash

The Director of Operations shall make available to staff such imprests as are considered necessary for the disbursement of petty cash expenses. The Finance Officer shall be responsible for maintaining full chronological records of petty cash disbursements, and for ensuring that the use of the petty cash is for authorised expenditure only. Petty cash should be fully reconciled at least monthly by the Finance Officer.

7.4 Procurement Regulations

The Director of Operations is responsible for ensuring that the College complies with its legal obligations concerning all relevant procurement legislation, namely the Public Contracts (Scotland) Regulations 2015, Procurement Reform (Scotland) Act 2014 and Procurement (Scotland) Regulations 2016. Staff should ensure they follow the appropriate process as detailed in the College's Procurement Policy, ensuring they consider the total value of the requirement in accordance with the relevant thresholds.

It is the responsibility of line managers to ensure that their members of staff comply by notifying the Director of Operations of any purchases likely to exceed the World Trade Organisation's (WTO) Government Procurement Agreement (GPA) thresholds. This will need to be done well in advance to permit adequate planning and adherence to the appropriate purchase process.

7.5 Payment of Invoices

The Finance Officer will prepare payments for invoices based on the agreed payment deadlines. These will be authorised by a member of the Senior Management Team before payment is made.

Payments will only be made against invoices which have been certified for payment by the appropriate budget holder. Certification of an invoice will ensure that:

- the goods have been received, examined and approved with regard to quality and quantity, or that services rendered or work done is satisfactory
- where appropriate, it is matched to the order
- invoice details (payee, quantity, price, discount) are correct
- the invoice is arithmetically correct
- the invoice has not previously been passed for payment
- where appropriate, an entry has been made on a stores record or departmental inventory

- an appropriate financial code is quoted. This must be one of the codes included in the budget holder's area of responsibility and must correspond with the types of goods or service described on the invoice.

Invoices must be passed to the Finance Officer as soon as they have been certified. Care must be taken by the budget holder to ensure that discounts receivable are obtained.

7.6 Travel, Subsistence and Other Allowances

The College Board has not determined a specific rate at which it will reimburse travel costs other than car mileage allowances. Instead all reasonable costs incurred on College business are met.

All claims for payment of subsistence allowances, travelling and incidental expenses shall be completed in a form approved by the Director of Operations, and supported, where possible, with receipts and vouchers.

Claims by members of staff must be certified by their line manager or the Principal. The certification shall be taken to mean that the journeys were authorised, the expenses properly and necessarily incurred and that the allowances are properly payable by the College.

8 Salaries and Wages

8.1 General

The Director of Operations is responsible for establishing and maintaining detailed payroll and pensions procedures.

The Director of Operations is responsible for all payments of salaries and wages to all staff including payments for overtime or services rendered. All timesheets and other pay documents, including those relating to fees payable to external examiners, visiting lecturers or researchers will be in a form prescribed or approved by the Director of Operations.

All College staff will be appointed to the salary scales approved by Board in accordance with appropriate conditions of service.

The Director of Operations is responsible for payments to non-employees and for informing the appropriate authorities of such payments. All casual and part-time employees will be included on the payroll.

The Director of Operations will be responsible for keeping all records relating to payroll including those of a statutory nature.

All payments must comply with Inland Revenue regulations.

8.2 Pension

The Board is responsible for undertaking the role of employer in relation to appropriate pension arrangements for employees.

The Director of Operations is responsible for day to day pension matters including:

- paying of contributions to various authorised pension schemes
- preparing the annual return to various pension schemes

9 Other

9.1 Companies

In certain circumstances it may be advantageous to the College to establish a company to undertake services on its behalf.

The Board is responsible for approving the establishment of companies and the procedure to be followed in order to do so.

It is the responsibility of the Board to establish the shareholding arrangements and appoint directors of companies wholly or partly owned by the College.

The directors of companies where the College is the majority shareholder must submit, via the Finance and Resources Committee, an annual report to Board.

9.2 Taxation

The Director of Operations is responsible for advising Heads of Departments in the light of guidance issued by the appropriate bodies and relevant legislation as it applies, on all taxation issues. Therefore, the Director of Operations will issue instructions, as necessary, to Departments on compliance with statutory requirements including those concerning VAT, corporation tax and import duty. The Director of Operations shall provide the same service in relation to Income Tax and National Insurance Contributions.

The Director of Operations is responsible for maintaining the College's tax records, making all tax payments, receiving tax credits and submitting tax returns by their due date as appropriate.

9.3 Security

Staff are responsible for maintaining proper security at all times including for all buildings, stocks, stores, furniture, cash, etc. under their control.

They shall consult the Principal in any case where security is thought to be defective or where it is considered that special security arrangements may be needed.

Staff shall ensure that appropriate arrangements exist for the safe custody of keys to safes or other similar containers under their control. The loss of such keys must be reported to the Estates & Facilities Manager or a senior manager immediately.

The Senior Management Team shall be responsible for maintaining proper security and privacy of information in line with the information security policy. The restriction of access to ICT areas to authorised persons and the use of passwords are the types of security control available that will be used. Information held relating to individuals will

be subject to the provisions of the Data Protection Act 2018. A data protection officer shall be nominated to ensure compliance with the Act.

9.4 Security of Documents

The Director of Operations shall be responsible for the safe keeping of financial instruments, loan agreements and other securities. The Secretary of the Board shall ensure that deeds, leases and other agreements shall be held in an appropriately secure location. Copies of the documents and other such documents must be forwarded to the Director of Operations who will arrange the safekeeping of such duplicates at a separate location. The Director of Operations shall be responsible for maintaining a register of such documents, and will arrange for verification of the physical contents to the register from time to time.

Newbattle Abbey College is committed to the active pursuit of challenging discrimination, advancing equality and celebrating diversity

This Policy should be read in conjunction with other relevant College policies, procedures and guidance documents, whether specifically listed above or subsequently published or amended.

The College reserves the right to update, introduce, or revise policies and procedures from time to time.

Compliance with the most current versions of applicable policies and procedures, as published, is expected.

Title:	Financial Regulations Procedure
Lead Officer:	Director of Operations
Date last reviewed	February 2025
Next Review date:	February 2027
Approved By:	Boad
Date first approved:	2008