

## Part 4 – Rules of Procedure

### Section 6 – Financial Regulations

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#### 1. Status of Financial Regulations

- 1.1 Financial Regulations are part of the Council's control environment providing a framework for managing the authority's financial affairs and contributing to good corporate governance, internal control and the management of risks.
- 1.2 The Financial Regulations apply to all officers and members of the Council and anyone acting on behalf of the Council. They also apply to any partnerships or bodies that the Council is a member of and for which the Council is the accountable body<sup>1</sup>.
- 1.3 It is the responsibility of Assistant Directors to ensure that all staff in their service areas/delivery units are aware of their responsibilities according to the Financial Regulations and comply with them.
- 1.4 Specific positions and/or officers are named in the regulations and it is their responsibility to ensure compliance. However, named officers can delegate their authority to another appropriate officer as long as this delegation has been recorded.
- 1.5 Where the Leader and Cabinet Executive has/have been named in Regulations it will be their responsibility to ensure compliance. The Leader and Cabinet Executive can delegate such responsibility to one of its Cabinet members as set out in the Constitution.

<sup>1</sup> Where the Council is not the accountable body then the lead Council officer is responsible for ensuring propriety and proper processes are followed so that the Council's reputation is not at risk.

- 1.6 All members and officers have a general responsibility for taking reasonable action to provide for the security of the assets under their control, and for ensuring that the use of these resources is legal, is properly authorised and provides value for money.
- 1.7 Financial Regulations are set out in self-contained sections, each covering a specific area of control. Each section provides a contact point for further information or clarification. Where appropriate the Regulations are supported by detailed procedure notes which can be accessed on the intranet, and links to these are provided in the document.
- 1.8 Any financial values are summarised in **Appendix A** to allow ease of update.
- 1.9 These Financial Regulations cover all areas of Council activity with the exception of schools which have their own set of regulations as part of the Local Management of schools (LMS) Scheme.
- 1.10 Failure to comply with Financial Regulations, or procedures issued under them, may lead to disciplinary action for employees and an investigation by the section 151. For Members any issues will be investigated by the/ Monitoring Officer. for Members.

## 2. Responsibilities

- 2.1 Section 151 of the Local Government Act (LGA) 1972 places a duty on the Council to make arrangements for the proper administration of its financial affairs, including the appointment of a Chief Finance Officer.
- 2.2 Section 114 of the Local Government Finance Act (LGFA) 1988 requires the Chief Finance Officer to report to the Council if the authority, one of its committees, the Leader and Cabinet Executive or one of its officers:
- Has made – or is about to make – a decision which has or would result in unlawful expenditure;
  - Has taken, or is about to take, an unlawful action which has or would result in a loss or deficiency to the authority; or
  - Is about to make an unlawful entry in the Council's accounts.

Section 114 of the LGFA 1988 also requires the Chief Finance Officer to nominate a properly qualified member of staff to deputise, should the Chief Finance Officer be unable to perform the duties under Section 114 personally.

\* **The Council** – means the full Council who provide the political and strategic direction of the authority. They approve the policies of the authority, including relevant~~these for~~ strategies and the budget.

\* **The Leader and Cabinet Executive** – means the Leader of the Council and the Cabinet members, who propose to Council policy and budget strategies.

\* **Chief Finance Officer (CFO) Responsibilities (s151/s114)** – these have been allocated to the Assistant Director: Finance, Audit & Information Governance and include:

- provision of financial advice for service delivery, strategic planning and policy making across the authority;
- provision of advice on the optimum use of available resources on the management of capital and revenue budgets;
- provision of financial management information;
- preparation of statutory and other accounts, associated grant claims and supporting records;
- provision of an effective internal audit function and assistance to management in providing safe and efficient financial arrangements;
- provision of effective financial management systems and procedures
- provision of effective income collection and payments systems;

- advising on treasury, investment and cash-flow management; and
- advising on the safe custody of assets and insurance.

\* **The Assistant Director Finance, Audit and IG** has delegated responsibility under the Accounts and Audit (England) Regulations 2011 to maintain an adequate and effective Internal Audit service, ~~and has direct responsibility for the operation and support of the Council's Scrutiny function. The Assistant~~ The Assistant Director Finance, Audit and IG has the ability to report directly, without fear or favour, to any level within the organisation or to the External Auditor.

\* **Senior Management Team (SMT) (Managing Director, Directors and Assistant DManaging directors)** are responsible for ensuring that Assistant Directors provide services that meet the Council's overall policy objectives. This includes ensuring compliance by Assistant Directors with the Council's governance arrangements including Financial Regulations and Contract Procedure Rules.

\* **The Managing Director** is responsible for leading on corporate governance issues throughout the Council.

\* **The Finance Managers** will act as deputy Section 151 Officer

\* **Assistant Directors** are responsible for ensuring the delivery of services by their respective Delivery Units. This includes ensuring compliance by Delivery Managers with Financial Regulations and Contract Procedure Rules within their service areas.

\* **Delivery Managers<sup>2</sup>** are responsible for the day to day provision of services and the management of the associated budget. This includes ensuring that all staff comply with Financial Regulations and Contract Procedure Rules in performance of their duties.

## 2.3 Financial Training

The Chief Financial Officer will provide detailed financial training to the Cabinet Lead member for Resources and should ensure that general financial training is available to the members of the Leader and Cabinet Executive and SeniorCorporate Management Team to aid have the financial capabilities or facilitate the development of specific skills to enable their roles to be carried out effectively.

The CFO should through senior finance staff seek to identify core financial competencies for managers and members and make provide adequate financial training available to enable them to undertake their roles effectively and understand the financial requirements of the Constitution and associated financial policies and procedures recognising resource constraints on both finance staff and service staff and members.

## 3. Financial Planning

### 3.1 Introduction

The Council is responsible for approving the budget, various plans and policies, which will be proposed by the Leader and Cabinet Executive. This will include the policy framework, the budget (including the capital programme) and the Council Plan. See Budget and Policy Framework Procedure Rules within the Constitution.

### 3.2 Financial Forecasting

The Chief Finance Officer shall, within the general direction of the Leader and Cabinet, Executive produce forecasts of financial resources and advise advises upon the financial and economic implications of medium and long term service development plans and programmes and budget

<sup>2</sup> Delivery Managers' also includes Group Managers and/or team leaders with budget and staff responsibilities.

strategies. In exercising this duty he/she shall be mindful of the Accounts and Audit (England) Regulations 2011, the Code of Practice on a Prudential Approach to Local Government Commitments and current accepted local government accounting codes and will review levels of reserves and balances and ensure that a robust budget process has been undertaken. The Chief Finance Officer is responsible for the Council's arrangements for under and overspendings to be carried forward to the following year.

- 3.3 The forecasts will indicate the likely changes to the Council's budget for the specified period both in terms of commitments arising out of statutory variations and Council policy and also the likely variations to funding from central or local sources.
- 3.4 The Leader and Cabinet Executive, having considered the forecasts and options for the specified period shall, propose the overall budget strategy to the Council for approval after the consultation process as outlined in the Budget and Policy Framework Procedures Rules within the Constitution.
- 3.5 All matters relating to the financial administration of the authority shall be kept under review by the members of the Leader and Cabinet Executive responsible for resources.
- 3.6 The full Council is also responsible for approving procedures and for agreeing variations to approved budgets, plans and strategies forming the policy framework.

**CONTACT: CFO – Assistant Director – Finance, Audit & Information Governance**

#### **4. Accounting Systems, Financial Records and Returns**

- 4.1 Proper accounting records are one of the ways in which the Council discharges its responsibility for stewardship of public resources. The Council has a statutory responsibility to prepare its annual accounts to present fairly its operations during the year. These are subject to internal and external audit. This provides assurance that the accounts are properly prepared and proper accounting practices have been followed and that arrangements have been made for securing economy, efficiency and effectiveness in the use of the authority's resources.
- 4.2 The Chief Finance Officer should ensure that there is a proper retention policy for financial documents. The periods for which documents are to be retained is specified in the retention of records procedure note (including the Destruction and Retention Schedule).
- 4.3 The CFO is responsible for determining the accounting systems and procedures adopted by the Council. No variations shall be made to accounting records and procedures without the written agreement of the CFO. In ~~particular Assistant~~ particular Assistant Directors should confer with the CFO before introducing or amending any books, forms, records, administrative procedures or computerised systems used in conjunction with accounting for cash, income, expenditure, stores and financial transactions generally.
- 4.4 Assistant Directors must maintain through their officers full and accurate records as agreed with the CFO to ensure the availability of all financial, costing and statistical and other information as may be required to fully and accurately maintain the accounts of the Council, and report on its finances. This includes the correct coding of expenditure in line with the CIPFA standard classifications. All accounting records will be maintained in accordance with current CIPFA Codes of Practice,
- 4.5 Assistant Directors are responsible for ensuring the completion and submission of Grant applications and financial returns. The Chief Finance Officer/~~Managing Director~~/Audit & ~~IG~~ Assurance Manager are entitled to such explanations or information as may be required prior to signing and forwarding to the relevant government department or agency. No bid for external funding shall be submitted without approval from the relevant Senior Management Team (SMT) ~~Priority~~ lead and relevant Finance Manager.

- 4.6 Assistant Directors are responsible for ensuring adequate records, financial and otherwise, have been maintained for all externally funded schemes subject to audit by the European Commission or grant awarding bodies

**CONTACT: Corporate & Customer Finance Manager**

**5. Financial Management and Control – Revenue**

- 5.1 The Council is responsible for setting and monitoring compliance with the authority's overall framework of accountability and control via the scrutiny and audit committee processes set out in the constitution. This section of the regulations deals with the preparation and approval of budgets, budgetary control and variations from budget provision. It applies to all areas of the Council's activities except schools. No expenditure is to be incurred or reduction in income authorised unless covered by these regulations.

**5.2 Preparation and Approval of Budget**

- 5.2.1 The Council will approve the overall spending plans of the Council.
- 5.2.2 The ~~form of~~ revenue estimates shall be determined by the CFO in consultation with Assistant Directors within the general guidelines of the Leader and Cabinet Executive and relevant professional requirements. Estimates shall be prepared annually before the start of the financial year and revised, if the CFO considers appropriate, during the course of the year.
- 5.2.3 Prior to the commencement of each financial year each Service Delivery Unit should prepare a Service Delivery Plan setting out the Service Delivery Unit's aims and objectives, ~~and expenditure and income projections within corporately agreed allocations of resources. These should be agreed with Senior Management Team (SMT).~~
- 5.2.4 Once the council's budget for the year has been approved the Assistant Directors and Delivery Managers can authorise expenditure within the limits agreed subject to the separate rules on virement.
- 5.2.5 The Delivery Managers must exercise appropriate financial control including monitoring income and expenditure on a regular basis.

**5.3 Budgetary Control (see also para 4.4 above)**

- 5.3.1 The corporate finance information system determined by the CFO is the Council's prime accounting record. It provides the mechanism for Assistant Directors and Delivery Managers to monitor and control budgets.
- 5.3.2 Assistant Directors and Delivery Managers are required to monitor their budgets regularly during the year and take immediate action as necessary. If it is considered that a particular budget head requires increasing, virement must be sought before any overspending occurs (see Virement section). Under no circumstances should expenditure be incurred without appropriate provision being put in place first.
- 5.3.3 Regular financial updates will be taken to the Leader and Cabinet Executive.
- 5.3.4 Generally all Council budgets are prepared on a cash limited (outturn) price base. This means that no supplementary estimates will be provided for inflation increases once budgets have been approved, except in exceptional circumstances.
- 5.3.5 Unavoidable cost increase, e.g. public utilities, increments etc, for which insufficient allowance has been made at budget time will need to be met by equivalent reductions elsewhere.
- 5.3.6 All reports to Senior Management Team (SMT) or Members must be cleared by finance staff for ~~financial implications~~ financial implications and should be made available to those staff in reasonable

time before due for submission It must be recognised that Finance staff may have several reports to prepare comments for as well as other time critical commitments so report authors should agree with the relevant finance officer when the report will be made available in advance.

5.3.7 No Assistant Director or Delivery Manager should plan to overspend his/her budget. All expenditure plans should be consistent with Service Delivery Plans. Potential overspends on particular budget heads will have been addressed during the year and, in some cases, virement will have been exercised.

## 5.4 Supplementary Estimates

5.4.1 The Council sets budgets for gross expenditure and income in the context of a cash limit. Therefore it is important that any additional commitments not covered in Service Delivery Unit budgets, (including where the net budget requirement of the Council is not increased), are funded by savings elsewhere or additional grant funding identified in advance of incurring the expenditure and do not increase the net budget requirement of the Council (see Virement section). In exceptional circumstances this may not be possible and if this is the case, approval should be sought from the Council for additional funding.

## 5.5 Grants

5.5.1 All grant bids must be approved by the relevant SMT **Priority** lead and a Finance Manager prior to submission.

5.5.2 Acceptance of grant terms must also be approved by the relevant Assistant Director and a Finance Manager.

5.5.3 All grant claims must be certified by a Finance Manager subject to the conditions of the grant awarding body.

## 5.6 Virement

5.6.1 Virement between budget heads is an integral and important feature of budgetary control. It provides Senior Managers with the flexibility to adapt expenditure patterns which they consider appropriate in meeting changing locally determined service needs and objectives consistent with Council policy. The ability to exercise virement applies to all controllable budgets.

5.6.2 Virement may be necessary for several reasons. For example:

- unforeseen cost increases,
- demand for a particular service, in line with existing policies, exceeding estimates,
- a local requirement to provide a different service from that anticipated at budget time for a particular client or to meet a particular situation, or
- utilising efficiency or other savings.

5.6.3 Except where allowed under the scheme of virement only the Council can approve changes to the budget it has previously agreed.

5.6.4 Assistant Directors, in consultation with the relevant Finance Manager, shall have the authority to make virements **within** each approved service delivery unit budget provided:

- It is within the overall policy framework;
- It does not involve an increasing commitment in future years, which cannot be contained within existing approved budget allocations.

5.6.5 The CFO, in consultation with the relevant Finance Manager and relevant Assistant Directors, shall have the authority to make virements **between** service delivery units provided:

- The amount does not exceed £50,000 (**LIMIT G**)
- It is within the overall policy framework
- It does not involve an increasing commitment in future years, which cannot be contained within existing approved budget allocations.

For amounts over £50,000 Assistant Directors and the Chief Finance Officer, shall have the authority to make virements **between** service delivery units with Leader and Cabinet Executive approval provided that

- It is within the policy framework
- It does not involve an increasing commitment in future years, which cannot be contained within existing approved budget allocations.
- The amount does not exceed £250,000

For amounts above £250,000s approval by full Council is required.

5.6.6 All virement decisions must be notified to the relevant Finance Manager (and the financial information system updated) before expenditure is incurred.

**CONTACT: Corporate & Customer Finance Manager**

## 5.7 Reserves & Balances and the Robustness of Estimates

5.7.1 The budget report will contain a comment by the CFO (Chief Finance Officer) on the robustness of the estimates and the adequacy of reserves, in accordance with the requirements of the Local Government Act 2003 and CIPFA guidance. The CFO must also be satisfied that the decisions taken on balances and reserves represent proper stewardship of public funds.

5.7.2 Specifically, the budget report will include a statement on the adequacy of general reserves and provisions for the forthcoming year, linked to the medium term financial strategy.

5.7.3 An annual review of earmarked reserves will be undertaken as part of the budget preparation process and a statement will be presented to Council alongside the budget report.

5.7.4 The level and purpose of reserves and balances held must be clearly defined and justified by Assistant Directors. Further regular reviews should be undertaken to ensure continuing relevance and adequacy.

5.7.5 There is no statutory minimum level of reserves required. This will be a matter of local judgement determined by the CFO but following relevant national guidance.

**CONTACT: Corporate & Customer Finance Manager**

## 6. Financial Management – Capital

6.1 Capital expenditure involves acquiring or enhancing fixed assets with a long-term value to the authority, such as land, buildings and major items of plant and equipment or vehicles. Capital assets shape the way services are delivered for the long-term and create financial commitments for the future in the form of financing costs and revenue running costs.

6.2 The Council will comply with the requirements of CIPFA's Prudential Code for Capital Finance in Local Authorities and will set and monitor a range of Prudential Indicators accordingly to ensure that borrowing is affordable, prudent and sustainable.

- 6.3 The Council will determine the capital programme for the Authority in line with overall Corporate Priorities, the Council's Asset Management Plan, Capital Strategy and availability of funding.
- 6.4 The capital programme shall focus on the medium term service & financial planning period but reflect the total cost and phasing of each approved scheme along with the proposed source(s) of funding.
- 6.5 The capital programme will demonstrate:
- the original and revised total estimated cost of each scheme
  - actual expenditure to the end of the previous financial year
  - forecast phased expenditure for the current and subsequent years
  - the revenue budget implications of the proposed programme
- 6.6 The CFO shall determine the method of funding for each capital scheme, having consulted with the relevant Assistant Director and working within the context of the various capital resources available. All proposed investments should be subject to an appropriate level of analysis/appraisal by the relevant service area before commitment.
- 6.7 The CFO shall ensure that an effective monitoring system is in place during the year to control capital expenditure. Assistant Directors will be responsible for notifying the CFO if it seems likely that there will be a significant variation in spending on a scheme. Variations may be permitted only if they can be accommodated by virement within the total capital resources available.
- 6.8 Variations, subject to the following limits, can be approved by those designated below if there is no significant impact on the delivery of individual elements of the capital programme and/or on the overall capital strategy.
- (a) Up to £50,000 (~~LIMIT G~~) – CFO in consultation with the relevant Assistant Director
- (b) Over £50,000 up to £250,000 (**LIMIT K**) – Leader and Cabinet Executive approval required
- (c) Over £250,000 (**LIMIT R**) – the Council.
- 6.9 Any capital expenditure over £50,000 even if entirely covered by additional external funding but outside the approved capital programme, must be approved by Council.

**CONTACT: Corporate Finance Manager**

**7. Taxation and Leasing**

**Taxation**

- 7.1 Like all organisations, the Council is responsible for ensuring its tax affairs are in order. Tax issues are often very complex and the penalties for incorrectly accounting for tax are severe. It is therefore very important for all officers and members to be aware of their roles and responsibilities.
- 7.2 It is the responsibility of Assistant Directors to ensure compliance with all tax regulations relating to their Delivery Units. This will include Income Tax, National Insurance, V.A.T. and tax accounted for under C.I.S. If in doubt, Assistant Directors should consult with the CFO. Delivery Units will be liable for any costs, including any penalties and interest charged for incorrect tax treatment.
- 7.3 Detailed guidance on taxation issues is incorporated within specific procedure notes.

**Leasing**

- 7.4 Leasing is a method of financing the acquisition of certain types of capital assets and allows the cost to be spread over several financial years through annual rentals. It is a specialised area of finance with

complex legal and financial agreements. Leasing arrangements may only therefore, be entered into by the CFO or his designated officer. Normal contract procedures should be followed in relation to leasing arrangements. [See Part 4, Section 7, Contracts Procedure Rules]

7.5 Detailed guidance on leasing issues are incorporated within specific procedure notes on the Intranet.

**CONTACT: Corporate Finance Manager**

**8. Controlled Stationery and Authorised Signatories**

8.1 All cheques and other controlled stationery, including receipt books, invoices, and Electronic Fund Transfer (E.F.T.) forms may only be ordered by the CFO or an authorised representative who shall make proper arrangements for their safekeeping.

8.2 Senior Management Team (SMT) ~~are~~ is responsible for maintaining a listing of authorised signatories in the form prescribed by the CFO.

8.3 Only authorised signatories may commit the Council to expenditure, including electronically, in line with relevant procedure notes by:

- Authorising Orders
- Certifying expenses claims
- Authorising petty cash purchase
- Certifying timesheets and overtime claims
- Signing and awarding contracts (see also Section 7, Contract Procedure Rules)
- Over certain limits mMore than one officer should be involved in the authorising process.

8.4 A financial limit shall be prescribed for all officers. The CFO in consultation with the Monitoring ~~Officer~~ Officer shall be responsible for establishing a consistent framework for financial limits across the Council based on the roles and the responsibilities of officers.

8.5 Assistant Directors are responsible for informing the CFO of any changes to authorised signatories and the responsibilities of officers.

**CONTACT:**

**For authorised signatories: Finance Officers**

**For controlled stationery: ~~Property & ICT Asset & Documentation Team~~administration**

**9. Internal Audit**

9.1 The Chief Financial Officer (CFO) under section 114 of the LGFA 1988 and the Accounts and Audit (England) Regulations 2011 has a statutory responsibility for the overall financial administration of the Council's affairs. Section 6 of the Accounts and Audit (England) Regulations 2011, says that the authority "must undertake an adequate and effective internal audit of its accounting records and of its system of internal control in accordance with the proper practices in relation to internal control.".The Chief Financial Officer shall, therefore, in accordance with relevant legislation arrange for a continuous and current internal audit of all areas of Council activities.

9.2 The relevant Internal Audit Standard setters for Local Government are CIPFA and they have endorsed the UK Public Sector Internal Audit Standards<sup>3</sup>. Internal Audit will operate to these Standards and any other relevant guidance. The definition of Internal Auditing within the Standards is:

<sup>3</sup> The Public Sector Internal Audit Standards (the Standards) are based on the mandatory elements of the Institute of Internal Auditors (IIA) International Professional Practices Framework.

Internal Auditing is an independent, objective assurance and consulting activity designed to add value and improve an organisation's operations. It helps an organisation accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes. Proper internal control practices are defined in the guidance on the Accounts and Audit (England) Regulations 2011 as the CIPFA publication – "Code of Practice for Internal Audit in Local Government in the United Kingdom". Internal Audit will operate to this Code and any other relevant guidance. The definition of Internal Audit within the Code is:

~~Internal Audit is an assurance function that provides an independent and objective opinion to the organisation on the control environment<sup>4</sup> by evaluating its effectiveness in achieving the organisation's objectives. It objectively examines, evaluates and reports on the adequacy of the control environment as a contribution to the proper, economic, efficient and effective use of resources.~~

- 9.3 As the definition outlines Internal Audit has a key role to play in independently reviewing the effectiveness of the Council's<sup>5</sup> arrangements/processes for ~~corporate~~ governance, risk management and ~~internal~~ control. It contributes an objective opinion to the Council's Annual Governance Statement ~~(including the Statement on Internal Control).~~
- 9.4 The existence of a continuous internal audit service does not in any way diminish the responsibility of SMT for the delivery of priorities and Assistant Directors for the management of the Delivery Units under their control and their responsibilities in respect to risk management and the systems of internal control.
- 9.5 The Audit & Information Governance (IG) Assurance Manager<sup>6</sup> should ensure that Internal Audit remains independent in its planning and operation. The Audit & ~~Assurance-IG~~ Manager should be responsible for maintaining periodic audit plans which have due regard to the key priorities and associated for the key strategic risks of the authority, the objectives and risks ~~involved~~ for each service area in delivering their services and the requirements of the external auditor. The plan will deliver work to provide reasonable assurance to the Council based on the resources available. The Audit & IG Assurance Manager must report to the s151 officer or the Audit Committee if there are insufficient resources or limitations in the scope of their work to provide reasonable assurance or a service consistent with the definition of Internal Audit in paragraph 9.2.
- 9.6 It is the responsibility of Audit & IG Assurance to review, evaluate and report
- upon the soundness and adequacy of financial and other accounting records and the processes for governance, risk management system and internal control within the Council s to provide their assurance for the Annual Governance Statement;
  - the extent to which the Council's assets and interests are accounted for and safeguarded from losses of all kinds arising from:
    - fraud and other offences
    - waste ~~extravagance~~ and inefficient administration, poor value for money or other cause
    - the suitability and reliability of financial and other management data developed within the organisation.
  - The soundness and adequacy of the data quality systems operating to collect and report on performance information

~~<sup>4</sup> The control environment comprises the systems of governance, risk management and internal control.~~

<sup>5</sup> Internal Audit's remit extends to the entire control environment of the Council

<sup>6</sup> The Audit & IG Manager is the Council's Chief Audit Executive as defined under the Standards and is the Chief Internal Auditor as defined in CIPFA's Statement on the Role of the Chief Internal Auditor who reports to the CFO

~~• The corporate governance arrangements of the Council~~

~~• The risk management processes of the Council both at Strategic and Service Delivery level~~

- 9.7 The Chief Finance Officer's authorised Audit & IG Assurance representatives shall be empowered to:
- enter at all reasonable times any Council premises or land
  - have access to all Council and partner records<sup>7</sup>, documentation and correspondence relating to any financial and/or other transactions or other business of the Council, its employees or members, as considered necessary by the CFO, Monitoring Officer or Audit & IG Assurance Manager.
  - have access to records belonging to third parties such as contractors or partners when required<sup>8</sup>
  - require and receive such explanations as are regarded necessary concerning any matter under examination from any employee, member, partner or third party.
  - require any employee or member of the Council or any partner/third party to account for cash, stores or any other Council property which is under his/her control or possession on behalf of the Council.
- 9.8 All work carried out shall have due regard for the requirements of the access to information legislation (e.g. Data Protection Act 1998, Freedom of Information Act 2000, etc.) and the Human Rights Act 1998, together with any other relevant legislation current at the time of the audit.
- 9.9 ~~Directors, Delivery Managers should agree the draft report and indicate the actions they propose within one month of receipt of the draft report.~~ Assistant Directors and Delivery Managers are responsible for implementing the agreed recommendations within responding to Audit & IG Assurance reports and the implementation of agreed recommendations within an appropriate timescale. ~~Delivery Managers should indicate the actions they propose within one month of agreeing the draft report.~~
- 9.10 Failure to implement statutory, policy or financial regulation recommendations within the agreed timetables may be referred to the Chief Finance Officer and the appropriate members, following consultation with the appropriate Assistant Director.
- 9.11 Internal Audit has specific fraud related responsibilities which are set out in the corporate Anti-Fraud & Corruption Policy. ~~Within the scope of their work Internal Audit also provide advice and consultancy in respect to issues around controls and governance, based on their professional knowledge and expertise.~~
- ~~9.12~~ It is the duty of any Officer or Member to follow the corporate Anti-Fraud and Corruption Policy. Any officer or member who suspects that an irregularity involving cash, materials or any other property of the Council may have occurred must inform the Assistant Director or report the matter directly to the Audit & IG Assurance Manager or Section 151 Officer. Confidentiality, wherever possible, will be respected in any dealings on such ~~matters.~~
- ~~9.13~~ ~~The matters.~~ The Section 151 Officer shall report to the Managing Deirector, the relevant Assistant Director, Director and Cabinet<sup>9</sup>, if appropriate, any matter of a significant nature.

<sup>7</sup> Records include business e-mail and internet records

<sup>8</sup> ~~As defined in the articles of association/memorandum, SLA, grant conditions or contract~~

<sup>9</sup> This should be the Cabinet or a specific Cabinet member and the Leader.

9.1~~24~~ Any decision to refer a matter as outlined in paragraph 9.1~~2~~ to the Police is to be taken by the Audit & ~~IG~~Assurance Manager after informing the Council's Section 151 Officer or their representative. Where a Member is involved the Managing ~~D~~irector, Monitoring Officer and where appropriate, the External Auditor, will be consulted. Where Police advice is sought but it is not intended that any criminal prosecution shall take place, the Audit & ~~IG~~Assurance Manager shall ensure that the anonymity of the individual(s) concerned shall be maintained at all times.

9.1~~35~~ ~~The Audit & IG Manager reports to the Audit Committee as defined in their terms of reference. This includes Internal Audit should report to a body of members~~ the following information:

- a) the Internal Audit plan and ~~Charter~~strategy;
- b) quarterly reports summarising the internal audit work undertaken and any key findings; and
- c) an Annual Report which provides Internal Audit assurance for the Annual Governance Statement.

9.1~~46~~ The Audit & ~~IG~~Assurance Manager and CFO have the authority to report, as appropriate, on any matter, without fear or favour, to all levels of the Council. This can include reporting directly to the Managing ~~D~~irector, Leader ~~or any and~~ Cabinet Executive ~~(including the~~ ~~Member~~lead Member for Governance), Chairman of the Audit Committee, ~~SMT~~, the Monitoring Officer or the Council's External Auditors.

**CONTACT:** Audit & ~~IG~~Assurance Manager

~~CONTACT: Audit & IG Assurance Manager~~

## 10. Public Accountability – Responsibilities

### 10.1 General

10.1.1 Members should ensure that they follow the Members Local Code of Conduct and have read the Members Handbook, taking any guidance into account including the declaration of any interest.

10.1.2 Employees should ensure that they follow the Employee Code of Conduct.

10.1.3 The corporate Anti-Fraud and Corruption Policy applies to all Members and Officers of the Council and they should be aware of its contents whilst representing and working for the Council.

10.1.4 An officer of the Council must not, under cover of his/her position or office of employment, accept any fee or reward, other than his/her proper remuneration without the express permission of the ~~SDM~~ ~~People Services~~Human Resources Manager/Assistant Director Customer and People Services.-

10.1.5 A member or officer must not accept any bribe or personal inducement in connection with the Council's business.

10.1.6 A member or officer must not use Council property, assets, materials or information for other than the purposes of the Council.

10.1.7 A member or officer must not subordinate his/her duty to the Council to his/her private interest or put himself/herself in a position where his/her duty and private interests conflict.

10.1.8 Employees must ensure that they declare any private interest they may have in any of the Council's activities. Such a declaration should be made where the employee could benefit in the form of a

financial or other pecuniary gain. The interest should be recorded in the Register of Interests held in Democratic Services.

## 10.2 The Cashing of Cheques

10.2.1 The cashing of cheques (whether Council or otherwise) by a member or officer is prohibited except in line with the Imprest Procedures.

## 10.3 Gifts

10.3.1 Officers and Members should follow the advice given in the guidance note on gifts and hospitality (see the Guidance Note on the Intranet). The receipt of personal gifts should be discouraged. If an officer, during the course of, or as a result of, official duties, receives or is offered any personal gift, other than one of only token value, the matter must be reported to the Assistant Director. The Assistant Director will decide if the item is to be returned, or forwarded to some charitable cause. The Assistant Director should inform the donor of what has happened to the gift, and explain the reason why gifts should not be sent in the future. A record should be made of all gifts accepted, refused and / or returned.

10.3.2 The SMT PA's team ~~and Directors and Directors PA team~~ must maintain a record for employees of all gifts offered, received, refused and any actions taken as outlined in the guidance.

10.3.3 Members should take equal care in receiving gifts whilst in office. Members Services will hold the records provided by members for all gifts offered, received, refused and any actions taken.

## 10.4 Hospitality and Services

10.4.1 Members and officers should follow the advice given in the guidance note on Gifts and Hospitality available on the Intranet. Hospitality must only be given or accepted when it is on a scale appropriate to the circumstances, reasonably incidental to the occasion, not extravagant and justifiable as in the public interest. It must be apparent that no cause could reasonably arise for adverse criticism or suggestions of improper influence by the acceptance of the hospitality. The circumstances and the type of hospitality should be agreed by the appropriate Assistant Director and a record should be kept of all hospitality offered, accepted or refused as in 10.3.2.

10.4.2 Members and Officers should not accept services. Any approach should be politely but firmly refused and if required an explanation made. The offer and rejection should also be recorded.

## 10.5 Private Work / Relations with Clients and Contractors

10.5.1 Officers who are, in accordance with the conditions of service and the procedure note on Business Activities and Private Work, permitted to carry out private or other paid work must not do so during Council time. Officers must declare to their Assistant Director in writing the nature and duration of such private work.

10.5.2 Members or Officers must not use any Council premises, resources or facilities for the execution of private work. No stationery or publicity material is to indicate that the person is a Member or Council employee nor should the address or any telephone number of the Council be stated. Members and Officers should pay due notice to the relevant section of the Local Government Act 1972.

10.5.3 Officers must not work for any current or prospective supplier or contractor to the Council where they have influence over the selection process or could provide information about the contract to the supplier.

10.5.4 Officers and Members must respect the confidentiality of information and must not use information received for personal gain.

10.5.5 Officers and Members should avoid any arrangements which might prevent fair competition.

**CONTACT:** Audit & ~~Assurance~~IG Manager

## 11. Purchasing Arrangements

### *General:*

11.1 These Financial Regulations should be considered in conjunction with the relevant parts of Contract Procedure Rules relating to contracts. Assistant Directors must ensure that any purchasing contracts comply with Contract Procedure Rules, related guidance, statutory requirements and European directives.

### *Financial Thresholds & Limits*

11.2 All contracts must adhere to the contract thresholds set out in the Contract Procedure Rules in Conducting a Purchase.

### **Works/Goods/Services**

## 12. Requisitions, Authorisation, Goods Received, Payments

12.1 Every officer and member of the authority has a responsibility to declare any links or personal interests which they may have with purchasers or suppliers and/or contractors if they are engaged in contractual or purchasing decisions on behalf of the Council. Officers should declare any such interest to their Assistant Director or relevant Director as soon as they become aware of such an interest. Members are responsible for amending their own entries in the Register of Interests held by Member Services as soon as they become aware of such an interest.

12.2 Official Orders are to be issued only by officers authorised by Assistant Directors. Authorised officers are responsible for authorising orders within their control and in particular for ensuring that the expenditure is necessary, legal and within the approved estimates or covered by a special financial provision.

12.3 The CFO should be notified of all officers authorised by Assistant Directors to authorise official orders.

12.4 Official orders shall be issued for all work, goods or services to be supplied to the Council; this must be in the form of an electronic order generated by the approved Corporate Procurement System, unless the Government Procurement card is used (see section 13 below). Authorising officers must be able to demonstrate that the work, goods or services are required in order to provide Council Services. Orders should not be raised for supplies of utilities, periodic payments such as rent or rates, or for purchases made through imprest accounts.

12.5 Telephone orders may be used in exceptional circumstances but when this happens they must be confirmed using an electronic emergency order.

12.6 All orders must be governed by the Authority's standard terms and conditions; these must not be varied without the prior approval of the Assistant Director: Development, Business and Housing and Legal Services.~~aw, Democracy & Public Protection.~~

12.7 Official orders must not be raised for any personal or private purchases, nor should personal or private use be made of Council contracts.

12.8 Assistant Directors and Service Delivery Managers shall separate the responsibilities for raising requisitions, authorisation of requisitions and receipt of goods, ~~so that~~but at least 2 different officers are ~~should be~~ involved.

- 12.9 Goods and services should be checked on receipt to ensure they are in accordance with the order and a Goods Receipt Note raised on the FMS system. Discrepancies should be dealt with as agreed procedures.
- 12.10 All payments, apart from the authorised use of imprest accounts (see Financial Regulation 18) due from Service Delivery Units and chargeable against their budgets shall be made in such manner as outlined by the CFO. Apart from payments from cheque imprest accounts the normal method of payment of money due from the Council shall be by BACS or other instrument drawn on the Council's bank account by the CFO. The use of direct debit and credit shall require the prior agreement of the CFO.
- 12.11 All invoices will be received by the Purchase Ledger team unless otherwise agreed. Once received the invoices will be scanned into the system and matched to the order and goods received note, where they exist. Mismatches will be resolved as per the agreed procedures.
- 12.12 Payments to construction contractors on account of contracts shall be made only on a certificate issued by a relevant member of SMT or other officer or external consultant nominated in writing for this purpose. This certificate shall show the total amount of the contract, the value of the work executed to date, retention money, amount paid to date and the amount now certified.
- 12.13 Any interest charged to the Council in respect of late payment under the Late Payment of Commercial Debts (Interest) Act 1998 will be passed on to the Delivery Unit that ordered the goods/services.
- 12.14 The Audit & **IG Assurance** Manager and Employment Services Manager shall examine accounts to the extent considered necessary and shall be entitled to make such enquiries and to receive such explanations as may be required.
- 12.15 Detailed guidance on Requisitions, authorisation, orders, good received notes and payments can be found within specific procedure notes on the Intranet.

**CONTACT: Strategic Procurement Manager or Employment Services Manager**

**13. Corporate Credit Cards and the Government Procurement Card (GPC)**

- 13.1 Usage is restricted to the following
- Corporate Credit Cards: The Leader and Directors have corporate credit cards. The CFO also has a card which can be used by other Council officers following strict guidance and authorisation procedures.
  - Government Procurement-Cards – as part of the process operated by Purchase Ledger and the Corporate Procurement Unit
- 13.2 Corporate Credit Cards: there are strict guidelines and procedures associated with the use of corporate credit cards which clearly state card holder responsibilities and allowed expenditure. The cardholder is responsible to account for all expenditure that is incurred on their card. Expenditure must be for business purposes only and VAT receipts must be provided for each transaction. There are set limits for expenditure against the Corporate Credit Card Account which must not be exceeded. The CFO will approve any additional cardholders.
- 13.3 GPC – the GPC process is in place to enable purchases by telephone, face-to-face or via the internet to streamline the procurement of low value, high volume transactions. Users will be authorised by their Delivery Manager and the process controlled by the GPC coordinator in the Corporate Procurement Team. Each card will have set limits for expenditure which must not be exceeded. Each user receives specific guidance on usage and their responsibilities. The GPC process negates the need for a traditional order; instead the user maintains a monthly log of expenditure, which is validated against the statement issued by the supplying bank. The cardholder is responsible for all expenditure on their card,

which is set out in an acceptable use policy. The account will be settled by Direct Debit on a monthly basis.

**CONTACT:**

Corporate Finance for further advice and guidance on the Corporate Credit Cards  
Corporate Procurement for further advice on the Government Procurement Cards

**14. Cash Income and Debtors**

- 14.1 Income can be a vulnerable asset and the CFO shall ensure that effective income collection systems are in place to ensure that all of the income due is identified, collected, receipted and banked properly. It is preferable to obtain income in advance of supplying goods or services.
- 14.2 Assistant Directors and Delivery Managers in conjunction with the Finance team are responsible for ensuring that all income due to the Council is received at the right time using the correct and most cost effective procedures and the appropriate stationery. Effective action shall be taken to pursue non-payment within defined timescales.
- 14.3 Effective monitoring of outstanding debts and regular reporting of outstanding debt provision will be provided to the CFO.
- 14.4 Assistant Directors and Delivery Managers shall, wherever possible, separate the responsibility for identifying amount due and responsibility for collection as far as is practicable. They should also ensure that any un-banked income is retained securely to safeguard against loss or theft and that receipts, tickets and other records of income are held securely for an appropriate period.
- 14.5 No debit in respect of an amount due to the Council once established shall be discharged otherwise than by payment in full except where write-off has been properly authorised as below:
- 14.6 Where the amount involved is £25,000 or less (**LIMIT C**) or the debtor has been declared insolvent or bankrupt and all monies due in dividends have been received, or the debtor being a company that has ceased to trade or is insolvent the writing off of the debt can be undertaken with the agreement of the Assistant Director concerned and the CFO. The CFO has ~~the~~ the right to inspect any documentation or evidence deemed necessary. Write-offs above £25,000 must be approved by the Leader and Cabinet Member for Resources and Service Delivery, Executive.
- 14.7 The cost of all write-offs will be borne by the Delivery Unit, which originally benefited from the credit.
- 14.8 Assistant Directors and Delivery Unit Managers shall promptly notify the CFO of any monies of £100,000 or more (**LIMIT J**) due to the council and of contracts, leases and other arrangements entered into which involve the receipt of money of this value by the Council. The CFO shall have the right to inspect any documentation or evidence deemed necessary.
- 14.9 All receipts, tickets and other acknowledgements for payments received shall be vetted by the CFO, and Internal Audit shall be satisfied as to the arrangements.
- 14.10 Each officer who receives money on behalf of the Council, or for which they are accountable to the Council, shall keep such records as from time to time be required by the CFO.
- 14.11 All money received by an officer on behalf of the Council shall be paid promptly and completely to the CFO, or as he/she may direct, to the Council's bankers. This should be preferably on the same day or if this is not possible at the earliest opportunity. In the interim the money should be kept securely. No deductions may be made from such money other than as may be approved by the CFO. When money is banked information as to the reason for its receipt, or its origin, shall be supplied.
- 14.12 Money held on behalf of the Council shall not be used to cash cheques for members, staff or third parties.

- 14.13 Assistant Directors shall review charges made for services under their control at least annually, in line with the Council's Income and Charging Policy.

**CONTACT:** CFO

## 15. Banking Arrangements

- 15.1 All arrangements with the Council's bankers must be made or approved by the Chief Finance Officer who shall be authorised to operate such bank accounts, including giro bank accounts as required.
- 15.2 Cheques drawn on the Council's banking account shall bear the facsimile signature of the Chief Finance Officer or be signed by him/her or such other identified senior officers as he/she may from time to time designate in writing.
- 15.3 The CFO shall maintain a list of identified senior officers who may on his/her behalf give instructions to the Council's banker and countersign cheques. These designated CFO senior officers must countersign cheques for amounts of £50,000 or more (LIMIT GF). ~~as CFO may from time to time designate in writing.~~
- 15.4 Standing order and direct debit payments may only be established by the ~~GFO or~~ CFO or such other identified senior officers as he/she may from time to time designate in writing.

~~15.5 The CFO shall maintain a list of identified senior officers who may on his/her behalf give instructions to the Council's banker and countersign cheques.~~

**CONTACT:** Corporate Finance Manager

## 16. Payments to Employees

- 16.1 The payment of all amounts to employees shall be the responsibility of the ~~CFO~~ CFO. Such payments will include wages, salaries, travel and subsistence and other allowances due under a contract of employment.
- 16.2 Assistant Directors shall, promptly notify the CFO in a form agreed of all matters affecting the payment to employees and in particular of:
- appointments, resignations, dismissals, suspensions, secondments and transfers;
  - absences from duty, apart from normal annual leave;
  - changes in remuneration, other than normal increments and pay awards and agreements of general application.
  - information necessary to maintain records of service for superannuation, income tax, national insurance etc.
- 16.3 Appointments shall be made only in accordance with approved structures, grades and evaluated rates of pay, unless agreed otherwise with the ~~Assistant~~ Managing ~~De~~irector or an officer nominated by him and a Finance Manager.
- 16.4 Any pay records, shall be in a form agreed by the CFO and shall be certified by or on behalf of the Assistant Director. A list of officers authorised to sign such records shall be sent to the CFO together with specimen signatures and any amendments to the list shall be notified in advance to the CFO in writing.
- 16.5 No payment shall be made to a person deemed to be an employee other than through the normal payroll procedure. Assistant Directors and Delivery Managers should give careful consideration to the employment status of individuals employed on a self employed consultant or sub-~~contract~~ contract basis as these may well be employees and should be paid through the payroll.

- 16.6 There shall be frequent reconciliation of payroll expenditure against approved budgets by the Finance team. Arrangements shall be made to ensure that appropriate payroll documents are retained and stored for the defined period.

**CONTACT:** Employment Services Manager or People Services~~Human Resources~~ Manager

## 17. Travel and Subsistence

- 17.1 Assistant Directors (or their nominated officers) are responsible for the verification of their ~~officers' travel~~officers' travel and subsistence claims. Assistant Directors must ensure compliance with the Council's Car Allowance Regulations, Car Leasing Scheme, Car Loan Scheme and other decisions of the Council that may be deemed appropriate. Standard mileages must be used where given and subsistence only reimbursed when supported by a receipt (within the limits stated in the guidance).

- Claims from Assistant Directors must be authorised by a Director/ Managing Director,
- Claims from Directors must be authorised by the Managing Director,
- Claims from the Managing Director must be authorised by the Monitoring Officer or CFO.
- Claims from Head teachers should be signed by the Assistant Director Education & Skills

- 17.2 The CFO will reimburse ~~members' claims~~members' claims on receipt of the completed claim form certified by the Member concerned. The Monitoring Officer will ensure that claims comply with the relevant section of the ~~Members' Allowance~~Members' Allowance Scheme.

- 17.3 All claims should be completed in full, appropriately authorised and must be submitted within three months of undertaking the journey or incurring the expenses, to qualify for reimbursement.

- 17.4 All foreign travel must be approved in advance in line with the Council's Overseas Visits procedure note.

- 17.5 Detailed guidance on Business Mileage and Expenses Reimbursement is available from Employment Services.

**CONTACT:** Employment Services Manager

## 18. Imprests

- 18.1 The CFO in consultation with appropriate Assistant Directors may make imprest advances to officers for the purposes of paying minor items of expenditure and any other items as may be approved by him/her.

- 18.2 The CFO reserves the right to withdraw imprest facilities from officers if it is deemed that they are being used inappropriately, the expenditure limit is exceeded, or the facility is rarely used.

- 18.3 The accounts should be maintained on an imprest basis using standard Council imprest stationery and recording procedures for this purpose. All officers should maintain a record of their receipts and payments in a form and manner prescribed by the CFO.

- 18.4 No income received on behalf of the Council may be paid into an imprest account but must be banked or paid into the Council as in section 15 of these regulations.

- 18.5 The imprest account should be continually kept in balance and records submitted as required by the CFO at regular intervals for examination and the reimbursement of expenditure.

- 18.6 The officer responsible for an imprest account shall, if requested, give the CFO a certificate confirming the amount held. Upon leaving the Council or at the request of the CFO the responsible officer shall repay to the Council the balance of the imprest held.

- 18.7 In no circumstances shall cheque imprest accounts be allowed to go overdrawn. The Delivery Unit concerned will be responsible for all bank charges, interest payments and administration charges if this occurs as a result of failure to submit reimbursement claims or if they are submitted too late in order that timely processing can take place.
- 18.8 Detailed guidance on Imprest and Petty Cash Accounts is incorporated within specific procedure notes which are included on the Intranet.

**CONTACT:** Corporate Finance Manager

## 19. Risk Management

- 19.1 The ~~Deputy Leader-Cabinet Member for Governance~~ is the lead member for Governance for the Council, including on risk management, for the Council.
- 19.2 The Managing ~~D~~irector is the lead officer in respect to Governance which incorporates risk management, and is responsible for the corporate risk management processes of the Council. The Managing ~~D~~irector is responsible for the development, co-ordination and maintenance of the Council's ~~Corporate~~ Risk management strategy processes which form part of the Service Planning process.- However it is the responsibility of all employees and members to ensure that the Council's risks are properly managed.
- 19.3 SMT will:
- (a) regularly review the Council's strategic risks
  - (b) report to at least annually to the Cabinet on an and by exception basis when significant risk management issues arise changes occur
  - (c) keep the ~~Deputy Leader lead Cabinet member for Governance~~ updated on their reviews of ~~the~~ strategic risks
  - (d) regularly annually review the risk management processes as part of service planning strategy
  - (e) include a summary of the risk management activities in the Annual Governance Statement approve an annual report on the Council's risk management activities
- 19.4 The Leader and Cabinet Executive will:
- (a) receive the exception reports on significant risk management issues arising during the year at least annually a report on the Council's key strategic risks and by exception when there are significant changes
  - ~~(b) annually review and approve the risk management strategy~~
  - (c) agree the Annual Governance Statement including the summary of risk management activities, approve an annual report on the Council's risk management activities
- 19.5 The Audit & ~~IG~~Assurance Manager will keep the Audit Committee informed of any issues arising from the risk management activities of the Council and exception reports presented to Cabinet, the reviews of the Council's strategic risks, the annual review of the risk management strategy and the annual report on the Council's risk management activities. This will enable the Audit Committee to independently review the ~~Leader and Cabinet Executive's and~~ Council's risk management processes as set out in their terms of reference.
- 19.6 ~~SMT~~Directors are responsible for the implementation of the Corporate Risk Management ~~processes strategy~~ within the services, projects and priorities that they lead.
- 19.7 ~~Assistant Directors are responsible for implementation of the Corporate Risk Management strategy within their service delivery units.~~ Assistant Directors are also responsible for ensuring that a proper risk assessment is undertaken for all new activities, projects, changes to services or partnership

arrangements and that where required controls are implemented or revised to manage these new/revised risks.

- 19.8 Each Assistant Director submitting a report to the Leader and Cabinet Executive, the Council or one of the Council's committees must ensure that any opportunities or risks arising from the proposed action or decision are clearly included in the impact assessment contained in the report.

**CONTACT:** Audit & IG Assurance Manager

## 20. Insurance

- 20.1 The CFO will be responsible for the Council's insurance. Only the officer identified by the CFO may obtain insurance cover on behalf of the Council.
- 20.2 Assistant Directors are responsible for ensuring that all new activities or assets that may introduce an insurable risk to the Council are notified to the Insurance Manager.
- 20.3 Each year Assistant Directors must check that the risk-financing strategies in place are sufficient for their risk exposures and notify any changes required to the Insurance Manager.
- 20.4 As soon as officers are aware of any loss, liability or damage-causing event that may give rise to a claim of any kind against the Council they must notify the Insurance Manager who will take the appropriate action to safeguard the Council's position.
- 20.5 Appropriate officers will co-operate at all times with the investigations of the Insurance Manager into any claims and will supply all information upon request. It is imperative that officers comply with the timescales for investigating claims. Failure could directly affect the authority's ability to defend a claim or could result in financial penalties being imposed on the authority/Delivery Unit.
- 20.6 The appropriate officer will make an annual declaration of any claims or events likely to give rise to a claim not yet reported to the CFO.
- 20.7 It is the responsibility of the Delivery Manager to ensure that all third parties using the Council's buildings are appropriately insured and that Contractors employed by the Council hold appropriate and valid insurance.

**CONTACT:** Insurance Manager

## 21. Security and Control of Assets

### 21.1 Stocks and Stores

- 21.1.1 Assistant Directors are responsible for determining an efficient stock holding policy to ensure stock levels are not in excess of normal requirements.
- 21.1.2 The Assistant Director shall supply the CFO with such information relating to stores as may be required for the accounting, costing and financial records of the Council.
- 21.1.3 Assistant Directors shall ensure periodic test examinations of stocks and shall ensure that all stocks are checked at least twice a year, and that a return of stocks in hand at the 31st March is certified.
- 21.1.4 After each stock check a return should be completed indicating any differences between actual and recorded stock. Where, after thorough investigation, differences cannot be reconciled, then the necessary adjustment should be made to the stores accounts. Adjustments to the accounts should be clearly identified and appropriately authorised. Copies of all adjustments should be available for inspection by Audit & Assurance Services. If the adjustments account exceeds £10,000 (LIMIT B) in

any year, the CFO shall report the circumstances to the lead member on the Cabinet responsible Resources and Service Delivery for Governance, together with explanations for the surplus/deficit.

21.1.5 Assistant Directors should ensure that any material surpluses or obsolete stock are disposed of in line with agreed Council procedure. All disposals should be recorded and the records should be available for inspection.

## 21.2 Inventories

21.2.1 Inventories shall be maintained by all Delivery Units of all Council assets, including ICT (see 21.3.2.2). The CFO shall define the extent to which the assets of the Council shall be recorded and the form in which inventories shall be kept.

21.2.2 A corporate inventory for all ICT assets shall be maintained by the Assistant Director Customer and People ~~Services~~ and Services and as such all items will be clearly identified and labelled. Delivery Managers should not arrange relocation or disposal without appropriate notification to the Assistant Director Customer and People Services.

21.2.3 All leased equipment should be clearly identified and labelled. The labelling should indicate that the item should not be sold (as it does not belong to the authority).

21.2.4 The Council's assets shall not be removed from Council premises except in accordance with the ordinary course of the Council's business unless specifically approved by the Assistant Director. Council property shall only be used for the Council's purposes unless specific instructions are issued by the appropriate Assistant Director. The Assistant Director shall be responsible for ensuring that any such agreements are recorded. Attractive and portable items such as computers, cameras, TVs, video recorders and playback/recording equipment should be identified with security markings as belonging to the Council.

21.2.5 All disposals will be in line with agreed Council procedures and E.U. directives. In addition, special procedures are in place to deal with the disposal of leased equipment – any queries should be referred to the Finance Manager (Capital and Treasury).

21.2.6 Delivery Managers are responsible for carrying out an inventory check at least once a year and ensuring that all items are accounted for. All discrepancies must be reported to their Finance Manager.

21.2.7 Detailed guidance on Inventories and Disposal of Assets is incorporated within specific procedure notes which are included on the Intranet.

## 21.3 Land and Buildings

21.3.1 The Assistant Director Development, Business & Housing shall be responsible for the Asset Management Plan and maintain or make arrangements for the maintenance of a terrier of all properties owned or rented by the Council.

21.3.2 The terrier should record:

- the date of acquisition or appropriation
- Council authority
- the holding Board
- purpose for which held
- location, extent and plan reference
- purchasing details
- particulars of nature of interest and rent payable
- particulars of tenancies granted

## 21.4 Information

21.4.1 The CFO is the Council's designated Senior Information Risk Owner and is responsible for ensuring that there is a proper information governance framework in place.

21.4.2 The SIRO is responsible for approving all Information Sharing agreements.

21.4.3 SMT is responsible for ensuring compliance with the Council's Information Governance framework.

21.4.4 Assistant Director's are the owners of the information<sup>10</sup> within their service areas.

~~SMT are responsible for the security of all information within their service area. Information can be stored on computers, transmitted across networks including the Internet, printed out or written down on paper and spoken in conversation.~~

21.4.~~52~~ SMT must ensure compliance with the Council's Corporate Information Security Policy to ensure:

- Confidentiality of information
- Integrity of information
- Availability of information
- Proper retention of information
- All software installed ~~is and used is properly licensed and~~ appropriate for business use and is properly licensed.

21.4.~~63~~ Assistant Directors SMT must ensure that appropriate Data Protection registrations are in place under the Data Protection Act for their ~~are in place to cover the use of information within their service areas.~~ This includes compliance with the regulation of information relating to individuals<sup>11</sup>.

~~The Data Protection Act 1998 makes provision for the regulation of information relating to individuals, including obtaining, holding, use or disclosure of such information.~~

## CONTACTS

Stocks and Stores, Appropriate Finance Manager CFO  
 Inventories, Audit & IG Assurance Manager  
 Land and Buildings, Assistant Director Customer and People Services  
 Information, CFO

## 22. Treasury Management

22.1 The Chief Finance Officer shall arrange all borrowing of monies, and make all arrangements concerning the investment or utilisation of capital monies or other funds.

22.2 In exercising the function, the Chief Finance Officer should comply with the contents of CIPFA's 'Code for Treasury Management in Local Authorities'.

22.3 The Council shall adopt a Treasury Policy Statement and an annual Treasury Management Strategy. The responsibility for their implementation and monitoring will be delegated to the Leader and Cabinet Executive.

<sup>10</sup> Information can be stored on computers, transmitted across networks including the internet, printed out or written down or spoken in conversation

<sup>11</sup> This includes obtaining, holding, using and the disclosure of individual's information.

- 22.4 The Chief Finance Officer shall report (at least half yearly) to the Leader and Cabinet Executive on the activities of the Treasury Management function and on the use of delegated Treasury Management powers.
- 22.5 The Audit Committee through their terms of reference (rather than the Budget & Finance Scrutiny Committee) will scrutinise the Councils Treasury management arrangements as set out in best practice guidance. The Chief Finance officer will provide appropriate information to enable them to fulfil this role.

**CONTACT:** Corporate Finance Manager

### **23. Unofficial and Voluntary Funds**

- 23.1 An unofficial or voluntary fund is defined as any fund, other than an official fund for the Council, which is controlled wholly or in part by an officer by reason of his or her employment by the Council.
- 23.2 Staff should seek approval from the appropriate Assistant Director before establishing an unofficial fund.
- 23.3 The Assistant Director shall maintain a register of all such funds. The register will include the following details for each fund:
- The name of the 'Responsible Officer', as defined in the procedure notes on Voluntary and Unofficial Funds, responsible for the day to day running of the fund;
  - The accounting period (which should generally be 1st April to 31st March);
  - Bank account details; and
  - Cheque signatories.
- 23.4 Assistant Directors shall ensure that all such funds are audited by suitably qualified auditors and are submitted within 6 months of the end of the accounting period to the Council and any other parties (i.e. clients, sponsors, charitable bodies) with an interest in the fund.
- 23.5 The CFO reserves the right to inspect all documentation relating to unofficial funds and seeks such explanations that are necessary to ensure they are being appropriately managed.

**CONTACT:** Corporate Finance Manager

## APPENDIX A

### Financial Limits

As financial limits require amending from time to time the limits itemised in the various regulations are referenced to this appendix. When amendments are actioned they will take the place of the amounts currently included in the detailed regulations.

Limit Reference	£
A	5,000
B	10,000
C	25,000
D	5,001 to 10,000
E	10,001 to 24,999
F	25,000 or over
G	50,000
H	75,000
J	100,000
K	250,000
L	500,000
M	Over 100,000
N	200,000
P	Over 200,000
Q	100,000 to 250,000
R	Over 250,000
S	EU Threshold (currently 156,442)
T	EU Threshold (currently 3,927,260)