

GROUP FINANCIAL REGULATIONS

Person Responsible	Director of Finance
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Group Financial Regulations

1. Financial Control

This section considers the financial and audit responsibilities of the Association's Board and Sub Committees and is to augment detail provided within the Association's Scheme of Delegation. These regulations also apply to the group subsidiaries.

1.1. The Board

The Association's Board and its subsidiary boards have ultimate responsibility for their organisation's finances with the WSHA Board having ultimate responsibility for the Group finances. The financial responsibilities are:

- To ensure the solvency of the Association and its subsidiaries
- To safeguard the Association's assets and the subsidiaries' assets
- To ensure the effective and efficient use of resources
- To ensure compliance with the Scottish Housing Regulator's performance standards
- To ensure that financial control systems are in place and are working effectively and that an annual statement of assurance is provided by internal audit
- To approve the Association's and subsidiaries' Corporate Business Plans and monitor performance against the plan
- To approve annual estimates of income and expenditure and to approve the financial statements and monitor performance against budget
- To recommend to the annual general meeting (AGM) the appointment of external auditors
- Treasury management including the conditions for borrowing or lending money
- Approval of major revenue, capital or otherwise material contracts
- Approval of major investments
- Approving the annual rent and service charge review

1.2. Audit Sub Committee

The Audit Sub Committee is accountable to the Board for the fulfilment of the responsibilities delegated to it as set out in its terms of reference in the Audit Sub Committee Handbook. Its primary role is to contribute independently to the Board's overall processes for ensuring that an effective internal control system is maintained. The committee considers issues with a financial implication or associated risk and advises the Board accordingly. The Audit Committee has the right of access to all information it considers necessary to fulfil its responsibilities and to consult directly with internal and external auditors.

Notifiable Events

Non-compliance with this policy or issues in relation to the areas detailed in this policy may be a notifiable event to the Scottish Housing Regulator. Further guidance and information in relation to Notifiable Events can be found at

<https://www.scottishhousingregulator.gov.uk/for-landlords/statutory-guidance/notifiable-events>

1.3. Audit Requirements

The Director of Finance is responsible for drawing up a timetable for the preparation of the annual financial statements and will advise staff and external auditors accordingly. The annual financial statements and management letter will be reviewed by the Audit Sub Committee. On its recommendation the financial statements will be submitted to the Board of Management for approval. External and internal auditors have the authority to:-

- Access all assets, records, documents and correspondence relating to any financial or non financial transaction
- Require and receive such explanations as are necessary concerning any matter under examination
- Require any employee of the Association to account for cash, stores or any other Association property under their control
- Request access to records belonging to third parties, such as contractors when required

1.3.1. External Audit

The appointment of external auditors will take place annually at the Association's annual general meeting. It is the responsibility of the Board to make recommendations following advice from the Audit Sub Committee.

The primary role of external audit is to report and reach an opinion on the Association's financial statements and to report on the appropriate use of funds. An examination of the financial statements, underlying records and control systems will be carried out. The external auditor's duties will be in accordance with advice set out in the code of audit practice and the Auditing Practices Board's auditing standards.

Each year the Audit Sub Committee will review the effectiveness of external audit. Provided the auditor's work is of a sufficiently high standard and reasonably priced, the Audit Committee will recommend that the Board should propose the reappointment of the auditor at the Annual General Meeting. We will re-tender for our external auditors on a five yearly basis, unless there is a change in circumstances, this will be done in line with the Association's Procurement Policy and Procedures.

1.3.2. Internal Audit

Internal audit is delivered by a suitably qualified individual or firm. It is, however, the Audit Sub Committee's responsibility to monitor the effectiveness of the internal audit function.

The main responsibility of internal audit is to conduct audits of the areas specified in the internal audit programme and to report on the adequacy of controls in these areas to the Audit Sub Committee on a regular basis. The audit programme should be set on a three year running programme as a result of an audit needs assessment by the Internal Auditor and agreed by the Director of Corporate Services. The Audit Committee and Director of Corporate Services may also request an audit at any time of areas of concern. The internal auditor is to be allowed direct access to the Board, Chief Executive Officer and chairperson of the Audit Sub Committee at any time.

We will re-tender for internal auditors every five years, unless there is a change in circumstances, to ensure that we obtain Value for Money. This will be carried out in line with the Association's Procurement Policy and Procedures.

1.3.3. Other Auditors

The Association may, from time to time, be subject to audit or investigation by HM Revenues and Customs, Scottish Housing Regulator, Audit Scotland, the Office of the Scottish Charity Regulator (OSCR) and the Financial Conduct Authority (FCA). These bodies have statutory right of access.

1.4. Responsibilities and Scheme of Delegation

The responsibilities of the Chief Executive Officer, Director of Finance and Corporate Management team are defined within the Group Scheme of Delegation which is detailed in the appendices.

1.5. Budgeting

1.5.1. Resource Allocation

Resources are allocated regularly, and at least annually, on recommendation of the Board.

1.5.2. Budget Preparation

The Director of Finance is responsible for ensuring the presentation of an annual budget to the Board for discussion. After discussion and agreement at Board and after any alterations requested the budget will be made available to Directors and managers identified within this document as responsible for budget areas. The budget will contain both revenue and capital information.

Following approval by the Board, the budget, at a detailed level, will be communicated to the budget holders.

1.5.3. Capital Expenditure

Capital Expenditure on land and buildings, and associated costs can only be undertaken if it is part of the development programme / budget approved by the Board or in exceptional circumstances, where outwith the Board cycle, as approved by the Chief Executive Officer / Director of Finance, the respective Chair of the Association and/or Development and Asset Management Sub Committee (DAMSC) and in accordance with the Scheme of Delegation.

Monthly management accounts detailing all expenditure will be submitted to the CMT for discussion and Quarterly management accounts will be presented to the Board for discussion.

Proposed capital projects on land and buildings may be brought to the DAMSC for a recommendation to the Board that the project be included in the approved development programme as and when required. Prior to a project within the approved development programme being submitted to a funding body, the DAMSC will receive a report containing:

- A statement which demonstrates the project's continued alignment with approved strategic plans
- An analysis of the estimated expenditure
- An analysis of the anticipated funding sources (grants, loans, reserves)*

- A financial appraisal of the project demonstrating its viability and contribution to the Association
- Confirmation of compliance with approved procurement procedures and regulatory body requirements
- Confirmation that Finance, Housing Services and Property have discussed the project and it can be accommodated within the Association's budget forecast

*Actual expenditure and funding will only be known after contractors/consultants have been selected and grant approval has been accepted.

1.5.4. Financial Planning

The Director of Finance is responsible for submitting the financial plan to the Board for approval. The financial plan will include long term forecasts for at least the periods required by Scottish Housing Regulator and lenders. The financial plan will be consistent with other strategic and development plans approved by the Board and will be incorporated into the Corporate Business Plan. Consideration of the financial impact of strategic aims flowing from the Corporate Business Plan will be included in financial forecasting.

1.5.5. Budgeting Control

The annual budget is broken out into account categories. All account categories are assigned to budget holders. The control of income and expenditure within each account category is the responsibility of the designated budget holder. Budget holders are responsible to their line manager for the income and expenditure allocated to their designated account categories. The budget holder will be assisted in this duty by management information provided by the Finance Manager, a member of the Finance team or drawn directly by the manager from the accounting system. The annual budget report should contain detailed information in relation to trends, analysis and consultation. All new Managers should have a detailed discussion about their budgets and efficiencies with the relevant Finance staff member. The budgetary process must be designed in a way that helps drive unnecessary costs from the business.

1.5.6. Additional Unbudgeted Income

From time to time the Association is in receipt of unbudgeted funds such as from the sale of dispersed stock etc. Where appropriate, these funds may be used to support expenditure that would not otherwise be undertaken. Decisions regarding the allocation of this expenditure are delegated to the Corporate Management Team up to a limit of £60,000 per item. Expenditure on items over £60,000 are subject to Board approval.

1.6. Accounting and Reporting Policies

1.6.1. Annual Audited Financial Statements

The annual audited financial statements are prepared on the historical cost basis of accounting as modified by the valuation of certain heritable properties. They are prepared in accordance with applicable accounting standards, and in the format required by the Statement of Recommended Practice (SORP) for registered social housing providers. The financial year is from 1st April to 31st March.

1.6.2. Monthly Management Accounts

Management accounts will be produced each month for the CMT to review, with the exception of April each year due to annual statutory accounts preparation. Quarterly reports will be presented to the board for periods ending 30th June, 30th September, 31st December and 31st March. These reports will be produced and issued within 6 weeks of the report date with the exception of 31st March where 10 weeks is appropriate as part of the preparation of the annual financial statements process. These will contain:

- A Statement of Financial Position
- A summary Statement of Comprehensive Income
- Income and expenditure broken down into account categories, showing actual to date, budget to date, variance to date (amount and explanation), and annual budget and where appropriate the year end projection
- Key ratio analysis

1.6.3. Monthly Budget Statements

Monthly budget statements for budget holders will be produced if appropriate each month reporting the results to the end of the month. These reports will be produced and issued within 4 weeks of the report date. The relevant member of the Finance Team will meet with budget holder on a regular basis to discuss results.

1.6.4. Returns

The Director of Finance and Director of Corporate Services are responsible for submitting returns and other periodic financial reports to regulatory bodies for business areas relevant to their respective areas of responsibility.

1.6.5. Records

The Director of Finance is responsible for the retention of financial documents. The Association is required by law to retain prime documents.

- Accounts raised 6 years plus current year
- Copies of receipts 6 years plus current year
- Payroll records 6 years plus current year
- VAT records 6 years plus current year
- Other financial documents 3 years plus current year

2. Income and Banking

2.1 General

The CMT is responsible for:

- Ensuring that appropriate procedures are in place to enable the Association to collect all income to which it is entitled
- Prompt collection, security and banking of all income received
- Ensuring that grants approved by funders are received and recorded in the accounts in an appropriate manner
- Ensuring that all claims for funds are made by the due date

2.2 Appointment of Bankers

The Board is responsible for approval of the appointment of the Association's Bankers on the recommendation of the Director of Finance. The service will be reviewed on a five yearly cycle with a report presented to the Audit Sub Committee outlining the operation of the existing banking arrangements with a recommendation whether to remain with the existing provider or to undertake a tender exercise for the services.

2.3 Banking Arrangements

The Director of Finance is responsible for liaising with the Association's bankers in relation to the Association's bank accounts, payment of BACS and issue of cheques. All cheque books shall be ordered on the authority of the Director of Finance who shall make proper arrangements for their safe custody.

Only the Director of Finance may open or close a bank account with the existing operational bankers for dealing with the Association's funds. All bank and loan accounts shall be in the name of the Association.

All cheques drawn and BACS payments on behalf of the Association must be authorised in the form approved by the Board. Details of authorised persons to sign cheques and authorise transfers to/from the deposit accounts are detailed in appendix A.

2.4 Cash Receipts

It is not the Association's policy to accept payments in cash. Cash however will be accepted in special circumstances, for example, when payment of arrears is made to avoid eviction or when cash is posted to the office.

All monies received within the office must be recorded on a daily basis. An authorised receipt will be issued.

Cash holdings must comply with the requirements of the Association's insurers. No deductions may be made from any cash collected on behalf of the Association prior to passing the funds to Finance for banking.

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

The Association's Cash Handling Procedures should be followed for all cash received.

2.5 Rents

The methods for collecting rents arranged by the Director of Housing and Community Services must be approved by the Director of Finance and the Board. The Director of Housing and Community Services should ensure that:

- Rents are collected in a timely and effective manner and in accordance with procedures detailed in the Income Management Policy and Procedure.
- Monitoring and reporting of both current and former tenants' outstanding rents are done as per the procedures in the Income Management Policy and Procedure.

2.6 Debt Collection (non-rent)

Other income is collected from the factoring service, rechargeable repairs and agency services. The Director of Finance and Director of Development and Asset Management should ensure that:

- Invoices are raised promptly in respect of income due to the Association
- Overdue debts are collected in a timely and effective manner and in accordance with procedures detailed in the factoring and rechargeable repairs policies and procedures
- Outstanding debts are monitored and appropriate procedures are employed to collect overdue debts

In the case of Agency Income and Housing Association Grant Claims the responsibility for collection lies with the Director of Development and Asset Management. For Factoring, this responsibility lies with the Director of Finance.

2.7 Write off Debts

The Association aims to pursue all debts due. However, when further efforts to collect overdue debts is considered uneconomic then any write offs must be done in accordance with the criteria for write-off as described in the Write-Off policy. An irrecoverable debt is one where an invoice or rent debit has been correctly raised but no payment or only part payment has been made and there is considered to be no prospect of further recovery of the debt. Categories of irrecoverable debt and credits are defined in the Write-Off policy as follows:

- Rent and Occupancy Charge
- Tenants' Rechargeable Repairs
- Owner Occupier Charges and their Rechargeable Repairs
- Recharges of Notice of Potential Liability for costs (NOPL)
- Recharges of Court Costs
- Charges to Owners or Lessees of Commercial Premises
- Rent and Service Charge Overpayments
- Home Loss and Disturbance Payments
- Ex Gratia Payments
- Miscellaneous Refunds

The Association would not normally consider any debt owed by a current tenant of the association or a current owner occupier or lessee to be irrecoverable and will take all reasonable steps to recover such debt in accordance with its income maximisation policies and procedures. Reference to the Write-Off policy should be made for exceptions to this principle.

On an annual basis as part of the budgeting process, the Association will make appropriate provision for bad debts which may require to be written off. The amount of provision may vary from year to year in recognition that debt levels themselves may vary.

The Association will regularly consider debt and credit cases that fulfil the criteria for write off and account adjustment and approve action as appropriate. Individual debts and credits identified for write off over £2,000 will be presented for approval to the Board. Debts and credits below this amount will be approved in accordance with the write-off policy.

In circumstances where a debtor is subsequently traced after write off of debts owing to the Association has taken place, the sums recovered are treated as income at the point they are recovered.

2.8 Gifts, Benefactions, Hospitality and Donations

The Director of Corporate Services is responsible for ensuring that records are maintained in respect of gifts, benefactions, hospitality and donations made to or declined by the Association. Members of the Board and members of staff are responsible for adhering to the Entitlements, Payments and Benefits Policy that sets out guidance on hospitality and gifts that are acceptable / unacceptable. All hospitality or gifts that are accepted by (members of the Board or staff) must be recorded in the Gifts Hospitality Register.

Limits concerning acceptable expenditure for entertaining guests from outside bodies are set out in the Association's Entitlements, Payments and Benefits Policy.

2.9 Security of Documents Signed

The Secretary of the Association is responsible for ensuring the safekeeping of official and legal documents.

3. Expenditure

3.1 Authorities

The Directors have overall responsibility for purchases within their department. Purchasing authority may be delegated to named budget holders within the department or authorised personnel in their absence.

Directors and budget holders are not authorised to commit the Association to expenditure without first ensuring that the expenditure will be covered by the designated budget.

Invoices should be authorised for payment by a member of staff with the appropriate authorisation limit and not the member of staff who originally placed the order.

Appendix B sets out the schedule of budget holders while appendix C contains the schedule of staff authorised to place orders, approve invoices for payments and their limits.

The relevant Director should provide the Director of Finance the details of any staff member authorised to sign in place of any other staff member listed on appendix C due to that staff member's absence.

Where the relevant Director is unavailable or absent another Director may approve expenditure in the Director's absence subject to the expenditure being recommended by a manager within the absent Director's directorate.

3.2 Petty Cash

The Finance department holds a petty cash float. The float is maintained on an imprest system. The petty cash float is £350. The Chief Executive Officer may with the agreement of the Director of Finance increase the limit should operational requirements require an additional cash float to be available. Once operational requirements no longer require the additional float the amount of cash held should be reduced to £350. Expenditure

exceeding £50 will not be covered by petty cash and other payment methods should be discussed with the Finance Team.

Employees responsible for petty cash must obtain receipts as evidence of disbursements by claimants wherever possible. A petty cash request form must be completed before petty cash is distributed. The request form must be completed by a member of staff and authorised by their manager in line with the delegated authority levels.

3.3 Purchase Orders

Purchase orders should be confirmed by official documentation for all work, goods or services to be supplied to the Association except for the supplies of public utility services, for periodic payments such as rent or rates, for petty cash purchases or for any exceptions that the Director of Finance may approve. Purchase orders must be signed by two members of staff, the member of staff requesting the purchase and their line manager/budget holder.

- Job orders must be raised for all day to day repairs, medical adaptation, gas servicing, electrical inspections and all other repair/services to properties.
- Official orders forms will be issued for all other purchases using the Association's standard purchase order form
- Development projects and major repair project expenditure should be confirmed by signed contracts, letters of appointment, official orders, etc.

3.4 Building Works

For larger works, out with the scope of reactive repairs, the Association will endeavour to obtain "Value for Money" by a combination of quotations, competitive tender and negotiation. The Association's Procurement Policy and Procedures sets out the policy and procedures to be adopted when seeking quotations for larger works contracts.

3.5 Development Projects and Building Contracts

Contracts for the construction of new buildings or the refurbishment of existing ones are the responsibility of the Board. This responsibility has been delegated to the Development and Asset Management Sub Committee (DAMSC) Contracts are administered by the Director of Development and Asset Management. In the absence of the Director of Development and Asset Management they would be administered by the Development & Projects Manager. Contracts will comply with the Association's procurement policy on development activities. The appointment of consultants will comply with the Association's Procurement Policy and Procedures.

All development projects will be subject to investment appraisal reviewed by the Director of Finance.

Following completion of a development project, a final report will be submitted to DAMSC. This will record actual expenditure against budget and will reconcile funding arrangements. For each project, documentary evidence concerning the decision making process will be retained for audit purposes.

3.6 Grant Offers

The Association receives various grants in support of its activities. It is important that all forms are completed appropriately and comply with the grant provider's requirements.

Appendix D provides details of those who are authorised to sign request for grants and grant offers.

3.7 Procurement of Services

Service procurement such as for solicitors, external and internal auditors should be carried out in accordance with the Procurement Policy and Procedures.

3.8 Non Housing Fixed Asset Additions

Capital expenditure on ICT and office equipment should be within the existing approved budget. Budget provision for the purchase of such equipment in excess of £15,000 will be made upon the approval of a suitably detailed business case approved by CMT.

3.9 Payment of Invoices

Payments will only be effected against invoices which have been certified for payment by the appropriate authoriser within their approved limits as set out in appendix C. The approval of invoices for payment will be evidenced by the relevant member of staff signing the invoice or sending an email approving the invoice in line with approval procedures. The signing of an invoice for payment means 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 (quantity, price) are correct
- The invoice is correct arithmetically
- The invoice has not been passed for payment previously
- Where appropriate, VAT regulations have been complied with
- The financial ledger account code is quoted, including account category, development scheme (if appropriate), area and function

Approved invoices must be passed to the Finance department as soon as they are certified

4. Salaries

4.1 General

The Association staff will be appointed to the salary scales approved by the Board. The Association is a member of Employers in Voluntary Housing (EVH) and salary scales and terms and conditions are set by EVH. The Board will be consulted by EVH on salary increases and changes to terms and conditions. Willowacre Trust is not a member of EVH and therefore retains the flexibility to determine its own terms and conditions and salary scales. Letters of appointment will be retained by the HR Officer in the HR system. The Director of Corporate Services is responsible for ensuring that the Director of Finance is informed of all matters relating to personnel for payroll purposes including:

- Appointments, promotions/regradings, resignations, dismissals, supervisions, secondments and transfers
- Absences from duty for any reason apart from annual leave
- Changes in remuneration including increments and pay awards
- Information necessary to maintain records of service for superannuation, income and national insurance

The Director of Finance is responsible for keeping all records relating to payroll.

Temporary Posts

The Chief Executive Officer may recruit temporary or fixed term staff or upgrade existing staff on a temporary arrangement subject to any additional costs being able to be met from within the overall salaries budget agreed by the Board (or in exceptional cases up to a maximum of 1% of over the approved salaries budget). This can be delegated to the Director of Corporate Services in the Chief Executive's absence. The approved budget should include a buffer to address temporary staffing changes. A Job Analysis form for each temporary post should be completed by the relevant Director.

Replacement of Existing Posts

Replacement of existing staff within existing compliment is delegated to Directors and Managers subject to the prior agreement by the Corporate Management Team (CMT) and completion of a Job Analysis form.

New Posts or Changes in Contracted Hours

New posts to the staffing compliment or permanent changes in staffing complement, beyond those that were agreed when the budget was approved, must be approved by the Board (or Staffing Sub Committee) in advance of the new appointment, with the exception of minor changes in the working hours of individuals up to a maximum of 1 day per week. A job Analysis form should be submitted by the relevant Director to the CMT in advance of a report to the Board or Staffing Sub Committee.

Overtime

Payments for overtime may be agreed in line with policy by the CMT dependent on available budget (and in accordance with the Flexi, Overtime and TOIL Policy).

4.2 Pensions

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

The Director of Finance is responsible for the day to day pension matters. These include the payment of contributions, and the submission of annual returns to the authorised pension schemes. The Director of Finance is responsible for auto enrolment compliance, reporting to The Pension Regulator, processing new pension applications with payroll and administration of life and critical illness cover.

The Director of Corporate services is responsible for the HR aspect of pensions; promoting the pension scheme to new employees and existing employees, and obtaining independent pension advice for employees who are planning for retirement.

4.3 Travel, Subsistence and Other Allowances

Staff travel and other expenses are paid along with the monthly salary payments in accordance with payment dates advised by the Finance team. Claims by members of staff must be completed on the approved form and submitted to Finance by the specified date (both the expense form and list of dates can be found on the HUB). Claims must be checked for arithmetical accuracy, be accompanied by appropriate receipts and coded to the appropriate expenditure code. They must be certified by the appropriate line manager as detailed in Appendix E prior to submission to Finance.

Board member expenses are paid by BACS. Claims must be completed in the approved form and certified by the Director of Corporate Services before being submitted to Finance.

The certification will mean that the journeys were authorised, and expenses are properly and necessarily incurred.

5. Assets

5.1 Acquisition of Land and Buildings

The purchase, lease or rent of land or buildings can only be undertaken with the approval of Development and Asset Management Sub Committee (DAMSC). CMT can approve acquisitions of properties consistent with the framework outlined in the Consolidation Strategy and it is expected that this is supported by grant funding. Any acquisition that has an anticipated Gross Development Value of £1million and above must be approved in advance by DAMSC. The Director of Corporate Services is responsible for maintaining the Association's land and property register.

5.2 Inventories

The Director of Corporate Services is responsible for maintaining a register of all office equipment, furniture, fixtures and fittings and IT assets.

5.3 Asset Disposal

Disposal of land and buildings must only take place with the authorisation of the Board or DAMSC with notification of the disposal provided to the Regulator in accordance with existing Regulatory rules. CMT can approve the disposals of up to two properties within a scheme consistent with the framework outlined in the Consolidation Strategy.

Disposal of equipment and furniture must be in accordance with the Disposal Policy.

5.4 Treasury Management (Investment and Borrowings)

The Board is responsible for approving a Treasury Management Policy statement. This sets out strategies and policies for cash management, long term investments and borrowings. The Board is responsible for ensuring implementation and monitoring. The Audit Sub Committee is responsible for annual review of the Treasury Management Policy.

All executive decisions regarding borrowing, investment or financing (within policy parameters) will be delegated to the Director of Finance. All borrowings and investments will be in the name of the Association and will conform to any regulatory requirements.

The Director of Finance will report to the Audit Sub Committee and the Board regularly in each financial year on the activities of the treasury management operation, on the exercise of treasury management powers and on monitoring and compliance.

The Association has external treasury management advisors in place. This service is rendered on a three yearly basis in line with the Association's Procurement Policy and Procedures.

6. Risk Management

The Board has responsibility for developing a risk management strategy. The purpose of the strategy is to identify the risks facing the Association and review the mitigation strategies adopted. The strategy will address all material liabilities and the risk of loss or impairment of assets. This will be prepared by the Director of Corporate Services and reported quarterly to Audit Committee and six monthly to the Board.

Risk management is ongoing. The Audit Sub Committee meet four times a year and at each meeting review the high level risks and actions being taken to mitigate high level risk. On an annual basis the Audit Sub Committee will review and update the Association's risk register where applicable.

7. Insurance

The Director of Corporate Services is responsible for effecting insurance cover. The relevant director is responsible for:

- Obtaining quotes
- Negotiating claims (on non-housing claims)
- Maintaining necessary records
- Dealing with insurers about specific insurance problems.
- Housing insurance claims
- Negotiating claims re housing.

The Directors should consider what actions they can take to ensure any agreements negotiated within their departments with external bodies cover any legal liabilities to which the Association may be exposed. The Director of Corporate Services' advice should be sought to ensure that this is the case.

The Directors must give prompt notification to the Director of Corporate Services of any potential new risks and additional property and equipment which may require insurance and any alterations affecting risks.

Insurance claims must be in accordance with the insurance claims procedures.

A register will be kept of all insurances effected by the Association and the property and risks covered.

All staff using their own vehicles on behalf of the Association shall maintain appropriate insurance cover for business use. Staff must sign a declaration form, on an annual basis, to confirm that their car is comprehensively insured for business use.

All staff using any of the company vehicles insured by the Association must complete an insurance questionnaire

8. Taxation

The Director of Finance is responsible for advising the Corporate Management Team on all taxation issues in the light of relevant legislation and guidance issued by the appropriate bodies.

The Association has charitable status and therefore is not subject to corporation tax. The Director of Finance is responsible for considering the taxation implications of any proposed income generating activities to ensure that the charitable status is not affected, seeking taxation advice where necessary.

Westscot Living, the Association's subsidiary is subject to corporation tax. The Director of Finance is responsible for all associated taxation matters and ensuring that all relevant taxation legislation is adhered to.

The Director of Finance is responsible for:

- Maintaining the Association's tax records
- Making all tax payments

- Receiving all tax credits
- Submitting tax returns by their due date as appropriate

9. Security

The Chief Executive Officer and Directors have ultimate responsibility for maintaining proper security at all times for all office buildings, office furniture, cash etc. under their control.

All sensitive information will be stored in a secure manner to maintain privacy. Personnel and payroll records will be kept securely within the HR system under the control of the Director of Corporate Services. Access to the payroll software operated within the Finance department will be password protected. All information relating to individuals will be subject to the provisions of the Data Protection Act. The Director of Corporate Services will be responsible for compliance.

10. Code of Conduct

Staff at all times will observe the Association's code of conduct in respect of financial probity, as detailed in the Statement of Terms and Conditions of Employment.

Members of the Board must disclose any interest in the Association's Register of Interests.

11. Performance Reporting

A quarterly report highlighting a summary of the performance of key areas of operations should be prepared and presented to the Board. Whilst comprehensive details of the various departments' performance should be provided, a summary of key performance indicators and trends should also be presented with suitable narrative explanations being prepared. The report must include benchmarked comparisons where appropriate.

12. Purchases

All purchases should be carried out in line with WSHA's Procurement Policy and Procedures which outline the delegated authority levels in respect of procurement and the procedures that are required to be followed dependent on the value of the purchase. All purchases should be made in line with these procedures and all staff should look to obtain value for money in respect of purchases on behalf of the Association.

13. Credit Cards

The Group operates corporate credit cards. The cards will only be used to make authorised payments that have been approved in advance and in accordance with group policy. The exception being an emergency situation e.g. placing a tenant in a hotel due to their home being uninhabitable.

All vouchers relating to purchases must be checked and retained by the credit card holder and the invoice authorisation procedure adhered to. Monthly reconciliations will be performed and finance staff will ensure that all appropriate back up is received and saved in a central location. All expenditure records must be signed off by the credit card holder and approved by a line manager.

Further details on the use of credit cards and associated procedures are contained within the Credit Card Procedure document.