



ST THOMAS A BECKET R C SCHOOL

FINANCIAL PROCEDURES

DATE OF LAST REVIEW: **SEPTEMBER 2019**

AGREED BY GOVERNORS: **SEPTEMBER 2020**

FREQUENCY OF REVIEW: **ANNUALLY**

DATE OF NEXT REVIEW: **SEPTEMBER 2020**

INTRODUCTION

AIMS AND OBJECTIVES

The Governing Body recognises the need for good financial control over the schools' resources and has formulated this policy in order to achieve the standards of financial management as outlined in Ofsted guidelines, the DfE Schools Financial Value Standard and to ensure compliance establishing proper financial management arrangement and accounting procedures in line with the Local Authority: The Royal Borough of Greenwich.

Who should read it?

The Finance Procedures is relevant to all staff at all levels. All staff with duties involving administration should be made aware of the contents of this document and have access to it. It is the responsibility of the Headteacher to ensure that staff follow the requirements of the manual whilst delivering this service.

Access to the Schools Finance policy and procedures.

An electronic copy of this document can be accessed on the shared drive and hard copies are able in both school offices, on request.

The key standards to be achieved are:

- The financial responsibilities of the Governing Body, its committees, the Head teacher and staff should be clearly defined and limits of delegated authority established.

- The budget should reflect the schools prioritised educational objectives as set out in the School Improvement / Development Plan, seek to achieve value for money and be subject to regular, effective monitoring.
- The school should establish sound internal financial controls to ensure the reliability and accuracy of its financial transactions.
- The school should ensure that purchasing arrangements achieve the principles of best value.
- All income due to the school should be identified and collected. All collections should be receipted, recorded and banked promptly.
- The school should properly control the operation of bank accounts and reconcile bank balances with the accounting records.
- There should be efficient procedures in place for the administration of personnel matters, including payroll where applicable.
- The school should control the use of petty cash.
- The school should ensure that it complies with VAT and other applicable tax regulations.
- Stocks, stores and other assets should be recorded and adequately safeguarded against loss or theft.
- The school should be adequately insured against exposure to risks.
- The Governing Body and Head teacher should be satisfied that they are meeting the requirements of the General Data Protection Regulation (GDPR) tailored by the Data Protection Act 2018 and any subsequent regulations and amendments.
- School voluntary funds should be administered as rigorously as public funds.

FINANCIAL MANAGEMENT RESPONSIBILITY

Full Governing Body

Chair of Governors: Mr B Cannon

Vice Chair of Governors: Mrs M Crabtree

Quorum: 6 members including a member of F&P Committee

Role:

The Governing Body of St Thomas a Becket has a strategic role in determining the educational and financial priorities of the school, ensuring that the financial resources delegated to it are used effectively and that adequate internal controls are maintained over these.

Responsibilities:

- To fulfil the statutory responsibility for the administration of financial management within the school.
- To formulate the written description of financial systems and procedures and ensure that these comply with the financial arrangements of RBG.
- To undertake an annual review of the Finance Policy.
- For members of the Governing Body, it's committees, the Head teacher, the Senior Leadership Team and Finance Officer to know their roles and responsibilities in relation to financial decision making.
- To undertake an annual review of the agreed roles and responsibilities.
- To set up a Finance Committee to consider strategic financial issues on behalf of the Governing Body, and to review the committee's remit and membership on an annual basis.

- To establish the financial limits of delegated authority to enter into commitments, to authorise invoices and the subsequent payment of these (e.g. cheques).
- To approve the financial procedures within the school and ensure that they comply with accounting procedures and arrangements in line with the Local Authority: The Royal Borough of Greenwich.
- To establish a register of business interests of governors, the Head teacher and any other staff who have the ability to influence financial decisions.
- To ensure that the priorities, aims and objectives are outlined in the School Improvement / Development plan and are costed and clearly linked to the annual Budget Plan.
- To approve the annual Budget Plan and ensure that it is submitted to the LA by the required deadline.
- To approve the annual CFR governors' outturn statement and the proposed use of surplus balance in excess of recommended limits and (where relevant) ensure that the Intended use of Balances Return is submitted to the LA by the required deadline.
- To report suspected financial irregularities to the Finance Director of the RBG, and as necessary convene disciplinary panels to consider the findings of investigations.
- To respond promptly to any recommendations made in audit reports and monitor the progress of any remedial action identified.
- To ensure that the school is able to demonstrate compliance with the DfE.
- Schools Financial Value Standard (SFVS) in line with the timetable determined by the DfE.
- To approve the school's completed SFVS.

FINANCE AND PERSONNEL COMMITTEE

Chair of F&P Committee: Mr B Cannon

Quorum: 4 members

Role:

The Governing Body of St Thomas a Becket School Primary School has delegated the responsibilities as agreed in the School Governors' Decision Planner as outlined below to its Finance committee.

All delegated decisions will comply with the Royal Borough of Greenwich financial procedures and arrangements for financing Schools.

Responsibilities:

- To oversee the preparation of the school's annual budget plan in accordance with the priorities within the school improvement plan (including the staff complement), for determination by the full Governing Body.
- To monitor expenditure and income by receiving regular reports from the Head teacher comparing expenditure to the original budget set, and report back to the full Governing Body.
- To approve virements at the level specified in the school's agreed financial procedures and in accordance with the levels of delegation agreed by the full Governing Body.
- To ensure the maintenance of the inventories and security of assets and the deletion of items from the inventory.
- To formulate and recommend to the Governing Body a charging and remissions policy for activities.
- To determine arrangements regarding petty cash.

- To determine the arrangements for the school fund accounts.
- To determine insurance arrangements.
- To determine matters relating to building maintenance, health and safety in accordance with the Governors' delegated responsibilities.
- To report appropriate financial information to parents in a format approved by the Governing Body.*

THE HEAD TEACHER

Mrs B Greally

Role:

To ensure that sound systems of internal control are in place and are implemented. To ensure that the financial administration of the school operates within the Royal Borough of Greenwich Financial procedures. In the absence of the Head teacher, responsibilities outlined below will be delegated the Deputy Head teacher.

Responsibilities:

- To prepare the annual budget plan for the Governing Body's approval.
- Prepare the School profile Statement (Staffing Structure)
- Ensure that the School Improvement / Development Plan priorities are properly costed and clearly linked to the school's budget plan.
- To undertake budget monitoring exercises on a half termly basis.
- To monitor the cash flow.
- To provide reports to the Governing Body on a termly basis on the financial position of the school. These should be in a format

approved by the Governing Body and report any variations in expenditure against the approved budget plan.

- To oversee the day to day management of the school's financial administration, ensure that sound systems of internal control exist over these and ensure that they comply within the Royal Borough of Greenwich Financial procedures.
- To report suspected bank and/or cheque fraud to the Finance Director of RBG.
- To consider and respond promptly to recommendations made in audit reports and advise the Governing Body of any remedial action to be implemented.
- To authorise orders, invoices and payments up to the limits agreed by the Governing Body as outlined in section on Budget Monitoring of this policy.
- Organisation of personnel in respect of financial administration, also ensuring that there are satisfactory contingency arrangements, particularly in the absence of key staff.
- To submit required returns to the Local Authority in line with published deadlines.
- To ensure that where budgets are delegated to a cost centre or departmental level (e.g.: Foundation Stage) that they operate within a similar control regime in respect of budget monitoring and reporting.

FINANCE OFFICER/SENIOR ADMINISTRATIVE OFFICERS

Finance/ Senior Admin Officer: Ms F Murphy

Senior Administrative Officer: Mrs M Harris

Role:

To implement the finance policy and procedures agreed by the Governing Body and Head teacher and to process financial transactions and activities in line with these. To maintain the school accounting system and to monitor the budget on a day to day basis.

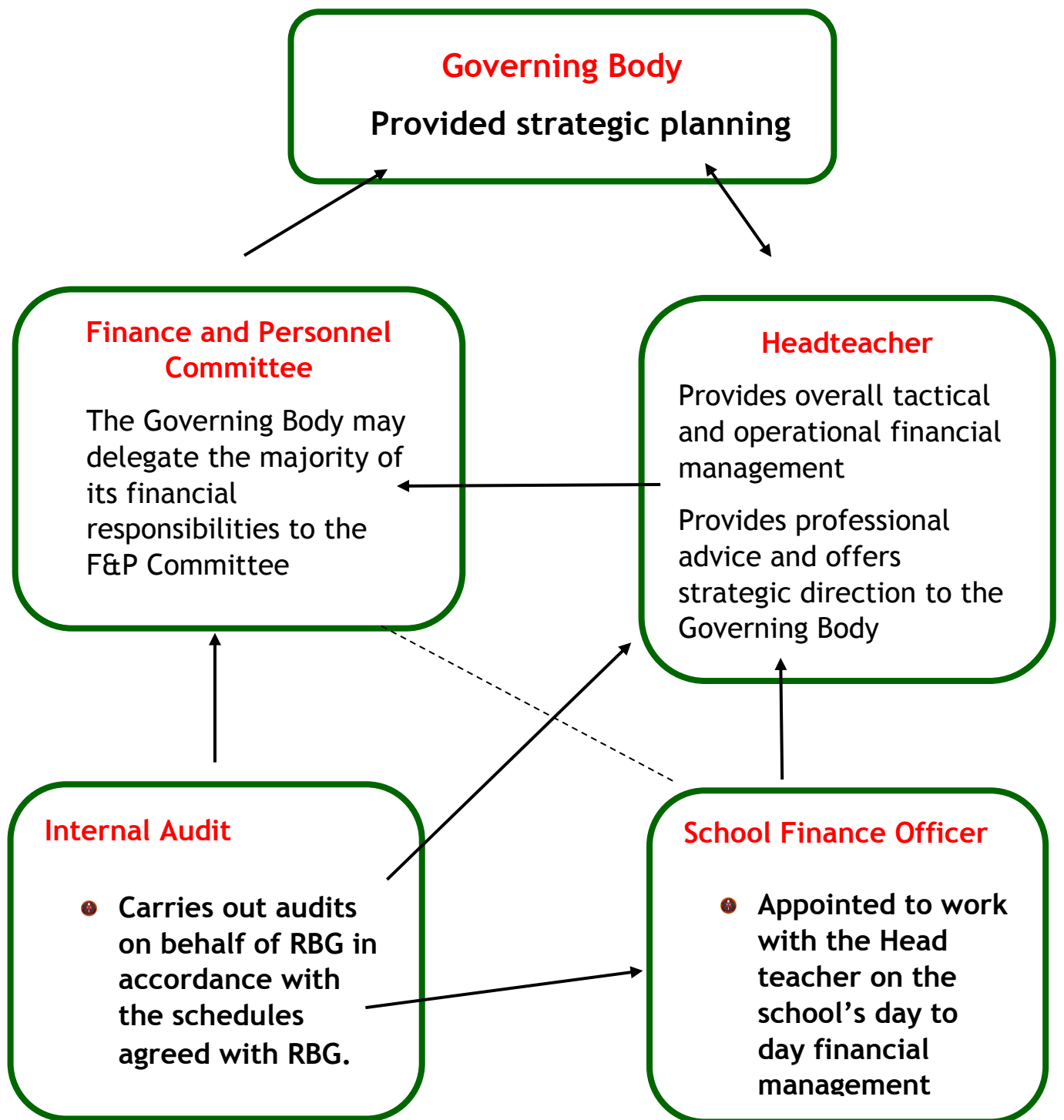
Responsibilities:

- To undertake responsibility for the day to day administration of the schools' financial administration including:

Ordering goods

- Authorising orders (up to limits of delegated authority)
- Receiving goods
- Processing invoices
- Authorising invoices (up to limits of delegated authority)
- Processing cheques to suppliers
- Signing cheques (up to limits of delegated authority)
- Payroll notifications and claims
- Staffing returns
- Monthly reconciliation of expenditure (pay and non-pay)
- Banking of income
- Maintenance of the School Fund accounts (including receipts and payments)

- To support the Head teacher in providing Half Termly monitoring information to the Governing Body, Cost Centre budget holders. (e.g.: Team Leaders and Premises Manager)
- To submit returns, alongside the Head teacher, as required by the Local Authority by the prescribed deadlines as outlined in the LA procedures and arrangements including the annual budget plan, re-forecast return, surplus balance return, monthly VAT reports, monthly Bank Reconciliation.
- To monitor the cash flow position of the school and report to the Head teacher on a regular basis.
- To assist the Head teacher in the preparation of the annual budget plan.
- To maintain the school accounts, reports and records in accordance with the Royal Borough of Greenwich Procedures and arrangements.
- To maintain the school fund accounts in accordance with the RBG Audit Service and to prepare the school, alongside the Head teacher and Governing Body for its financial audit.



COST CENTRE BUDGET HOLDERS

Cost Centre Budget Holders are members of staff who are responsible for selecting and sourcing curriculum materials and resources for their respective subject or responsibility area. These are purchased subject to the approval of the Head Teacher. Individual budgets are monitored by the Head teacher and the school's Finance Officer.

Role:

To undertake the effective and efficient management of and to remain accountable for, the resources delegated to them by the Governing Body /Head teacher.

Responsibilities:

- To undertake the day to day monitoring and control of budgets delegated to them.
- To ensure that any goods/services purchased from the delegated budget are done so in accordance with the Schools Financial Management Procedures and RBG Financial procedures and arrangements.

FINANCIAL PLANNING & BUDGET MONITORING

The school has aims and objectives for its financial planning and this forms the basis for constructing budget plans. The school has both medium term educational School Improvement and budget plans which outline the areas of priority with regards to spending, showing how the use of resources is linked to the achievement of the school's goals.

The Head teacher, the Senior Leadership Team, the teachers and the Governing Body has established a formal procedure for planning the School Improvement /Development plan and the budget and has set out a timetable for the process.

- The Head teacher will prepare estimates of expenditure and income in good time for consideration and approval by the Governing Body.
- The Governing Body will ensure that planned expenditure does not exceed the available budget allocation during budget reviews.
- The Head teacher will forward details of the approved budget to the Governing Body for timely consideration and will also alert the Governing Body of any subsequent changes to the budget.
- The Governing Body / Head teacher should report to the LA on the intended use of any balances as set out in the Royal Borough of Greenwich Procedures and arrangements by 31st May each year.
- The Governing Body should ensure that the main elements of the school's budget are subject to a periodic review to ensure that the school works within the principles of Best Value and that historic spending patterns are not repeated without challenge.
- The school operates a system of budget profiling and cash flow forecasting under the guidance of the Accounts Officer (RBG services

bought in to take account of likely spending patterns and the Head teacher will ensure that this is made available to the Governing Body at all planned budget review meetings.

- The Head teacher/RBG Accounts Officer will provide a report on expenditure, including items committed but not yet paid, and reconciled against Local Authority records, at each Finance review meeting. This report should include details on any significant variances against the approved Budget Plan and where necessary any remedial action plans and monitor the expenditure on the initiatives set out in the School Improvement / Development plan.
- The Head teacher is authorised by the Governing Body to appoint a cost centre budget holder for any department/subject as appropriate within the school and may delegate the responsibility to spend within a department's annual budget allocation to the department's appointed budget holder.
- The Head teacher/Finance officer will provide cost centre budget holders access to regular reports on spending and these will be reviewed with the Head teacher/Finance Officer periodically or as deemed appropriate.
- The Head teacher/Finance Officer will ensure that the Governing Body is made aware of all virements made.
- The Head teacher and the Governing Body will assess the progress made against the stated objectives in the School Improvement / Development plan.
- The Head teacher will periodically consult the Governing Body and relevant staff to ensure that the financial and management information issued is relevant, timely, reliable and understandable. This review will be conducted at least annually.
- The Head teacher will report any proposal for policy changes which significantly affect the expenditure or income budgets at the next

Finance Committee meeting or bring forward the Finance Committee Meeting, if deemed necessary.

- The Head teacher will ensure that the capital expenditure limits as set by the LA are not exceeded without written approval from the LA.
- Where written approval is sought by the Head teacher to place a high value order or enter into a contract, the Governing Body will be informed of the amount and reason for the expenditure.

INTERNAL FINANCIAL CONTROLS

Role and Responsibilities

- The Governing Body will ensure that there are clear procedures of the school financial systems and arrangements. These should be kept up to date and all relevant staff trained in their use.
- The Head teacher will ensure that appropriate cover is available in the absence of key personnel to ensure that financial control is maintained.
- The Head teacher will ensure that proper accounting records are maintained and held securely. Financial documents will be retained in accordance with RBG Finance Procedures and arrangements.
- An audit trail of all financial transactions will be maintained from original documentation to the accounting records, and vice versa.
- Accounting records will be properly and securely maintained and access to these will only be permitted to authorised staff. The Head teacher will determine who is authorised to access the records.

- The Head teacher will ensure that expenditure from ring fenced sources of funding are used for their intended purposes and are identifiable within the school accounts and supporting records.
- The Governing Body should ensure that a professional internal audit takes place on the financial arrangements of the school at least every 3 years.
- The internal audit provider selected must be CCAB qualified, have all relevant insurances and professional indemnities and carry out their work in compliance with the CIPFA code of practice for Internal Audit 2006.
- Where a provider other than RBG Internal Audit Services is chosen, the details of the organisation selected must be notified to the Head of Internal Audit. A copy of the final audit report and the school's responses to the recommendations made must also be forwarded to RBG Internal Audit Services within four weeks of receiving the report.

ORDERING AND PURCHASING

St Thomas a Becket seeks to achieve efficiencies and value for money in the goods and o services they procure, to optimise the use of their resources and to invest in teaching and learning, taking into account the purchasing and contracting requirements set out by the Governing Body. Before any orders are placed, the person responsible for placing the order will ensure that the school is achieving value for money. Consideration will be given to price, quality and fitness for purpose.

- A. The financial limits of delegated authority as approved by the Governing Body for entering into commitments and ordering goods and services are as detailed below:-
- B. For all curriculum and educational resources purchased by Key Stage Phase Leaders/ Team Leaders and the Finance Officer, approval is required from the Head Teacher (or Deputy Head Teacher in her absence). Items costing over £10,000, 3 quotes should be submitted to the Governors FP&GP Committee for approval.
- Expenditure above the Head teacher's delegated authority, but below £25,000 must be approved by the Finance Committee and formally recorded in the minutes of the meeting.
 - All orders must be signed by the Head teacher (or the Deputy Head in her absence).
 - The signatory should be satisfied that the goods or services ordered are appropriate and necessary, that there is adequate budgetary provision and that quotation /tendering procedures have been followed.
 - All intended purchases with an estimated value of £25,000 or more must be awarded by one of the following methods:-
 - open competitive tendering by an advertisement in at least one local newspaper and an appropriate trade journal;
 - selective tendering from at least three recognised sources known to be suppliers of the goods and/or and services in question;
 - such other arrangements made with the prior written approval of the Chief Finance Director of RBG or the Catholic Education commission.

- Purchases or contracts with an estimated value of between £10,000 and £25,000 can be awarded by one of the methods described above or by inviting at least 3 alternative written offers or quotations. In circumstances where obtaining 3 quotations is impractical (A Single Tender Action) the reasons for not following these procedures must be reported to the Governing Body and recorded in the minutes of the meeting.
- A Single Tender Action is permitted when:
 - Specialist expertise or product is required and is only available by one supplier
 - Works, supplies or services are urgently needed for the immediate protection of life or property or to maintain the immediate functioning of the school.
 - The service is essential to complete project and arises as a consequence of a recently completed contract/assignment where engaging a different supplier for the additional service would be inappropriate/not cost effective or
 - The funding/grant provide has specifically stipulated that a particular supplier or procurement procedure be complied with the goods /services that are being procured.
- Single tendering still requires a tender or a request for proposal to be drawn up to reflect the school's requirement and the supplier will be approached in the same way as if a full complement of tenderers were being given the opportunity to bid for the work.
- For purchases of less than £5,000, the Governing Body under the guidance of the Head teacher will make the most suitable arrangements for the ordering of works, goods and services or disposal of equipment and goods but will obtain alternative offers or quotations wherever possible.

- All contracts, orders and purchases with an estimated value of £25,000 or more will be subject to a decision of the full Governing Body and recorded in the minutes of the meeting.
- The Governing Body will be informed of all instances where a quotation has been accepted that is not the lowest or most financially advantageous option available. This will be recorded in the minutes of the meeting.
- The purchasing of works, goods or services can be entered into without the tendering or quotation procedures described above if the order or contract is placed with DfE, The Royal Borough of Greenwich or the Catholic Education Commission.
- Official prior pre-numbered orders are raised for all works, goods and services (with the exception of utilities, rents, rates and petty cash payments).
- When an order is placed, the value should be committed against the appropriate budget heading on the schools financial system so that it is included in budget monitoring reports.
- Official orders will only be used for goods and services provided to the school. Individuals are not permitted to use official orders to obtain goods or services for their private use.
- The Finance Officer/Senior Administration Officers will ensure that goods and services are checked on receipt to ensure that they match the order. Wherever possible, the person responsible for checking the goods or services is not the person who orders the goods and processed the invoice. The checking procedure should be recorded on the order/delivery note and passed to the person responsible for processing invoices.
- The Finance Officer will ensure that payments are only made to a supplier once the goods or services have been received and checked and confirmed as being satisfactory, and on receipt of a proper

invoice which has been received, checked, coded and certified for payment.

- The limits of delegated authority as approved by the Governing Body for authorising invoices for payment are as detailed below. There is no limit set for the Head teacher as control over the level of authorisation has already been applied in the ordering process.

Headteacher: Unlimited providing the correct procedures for ordering and invoicing have been followed.

Deputy HT: Unlimited when acting for Head Teacher providing the correct procedures for ordering and invoicing have been followed.

Finance officer: Second signatory but the other signatory must be that of the Head Teacher or nominated representative (Deputy Head teacher) providing the correct procedures for ordering and invoicing have been followed.

- Wherever possible, the authorisation of an invoice should not be performed by a person if they have also authorised the order and checked the receipt of goods or services.
- All cheques raised require two signatures and these must be employees of the school. As outlined in the school's bank mandate all cheques in excess of £1,000 must be signed by the Head teacher.

INCOME

Income may be generated subject to the provisions of the Education Act 1996. St Thomas a Becket generated income from a variety of sources for example:

- School meals sales
- Bank account Interest
- School visit contributions
- Fund raising activities

St Thomas a Becket retains all income generated.

Charging and Remissions Policy

St Thomas a Becket has a Charging and Remissions Policy which takes into account each type of activity charged for and provides an explanation of the charges made. The policy presented annually to Governors for approval based upon the school Budget Plan.

At The present time, the school does not provide ant lettings or supplies any other goods or services. If this was to occur in the future, the Governing Body will determine the charging policy for lettings and the supply of these goods and services. This will determine the rates of hire in place and will be reviewed on an annual basis.

- All income is receipted to FMS and recorded in appropriate cost centres-school meals, milk, School Fund and School Journey.

BANKING ARRANGEMENTS

- The Head teacher will ensure on behalf of the Governing Body that the operation of the school bank account is in line with the guidance set out by the RBG finance procedures and arrangements.
- The Head teacher will ensure that appropriate steps are taken to reduce the risk of bank / cheque fraud occurring or minimise the potential loss in line with the Bank Account Scheme- Lloyds Banking
- The Finance Officer will ensure that bank statements are obtained on at least a monthly basis and reconciled against the school financial system and relevant accounting records. Bank reconciliations will be signed as evidence of completion.
- The Head teacher or nominated person will certify the monthly bank reconciliation and countersign the relevant reports as evidence that the checks have taken place as explained below:

Bank Reconciliation

A Bank Reconciliation is the reconciliation of St Thomas a Becket accounting system (SIMS and FMS) to the school's bank transactions (bank statement). It is a key financial control.

- St Thomas a Becket performs bank reconciliations monthly and a document demonstrating this reconciliation is forwarded to RBG Schools Accounting department.
- St Thomas a Becket submits to RBG Schools accounting a bank reconciliation statement signed by the Headteacher each month.

The bank reconciliation document comprises of three documents;

- Bank statement for the period concerned
- Reconciled items or list or balance
- Un-reconciled items list.

- Both the reconciled items list or balance document and the unreconciled items list are taken directly from FMS.
- St Thomas a Becket follows all year end guidance as instructed by RBG
- Only manuscript signatures are to be used (i.e. not stamps) and cheques should not be pre-signed.
- Chequebooks will be held securely when not in use.
- The Finance officer will maintain a list of all bank accounts held by the school and a list of authorised signatories for each of these.
- The Finance Officer will ensure that the school's cash flow is regularly monitored to ensure that the account does not become overdrawn.

PERSONNEL AND PAYROLL

- The Governing Body has established procedures for the administration of personnel activities, including appointments, terminations and promotions a copy of which is held in the school office.
- The Head teacher will ensure that the duties of authorising appointments, making changes to conditions or terminating the

employment of staff are separated from the duties of processing payroll notifications and claims wherever possible.

- The Head teacher will ensure that all processes in relation to completing, checking and authorising any documents and claims related to appointments, terminations of employment and expenses are carried out by more than one person.
- Details of staff able to authorise any documents and claims should be forwarded to the school's payroll bureau, including specimen signatures where required.
- The Head teacher will ensure that personnel records are kept securely and only authorised personnel have access to them.
- All payments to individuals should be made through the payroll system except where an employment self- assessment questionnaire has been completed and the Head teacher is satisfied from reading the guidance that the contract is one of self -employment.
- The Head teacher will maintain a list of all staff employed at the school. This will be updated on an annual basis to reflect new starters and leavers.
- The Head teacher will ensure that regular payroll checks are carried out on payroll transactions against the schools documentation on staffing and pay to ensure they match.

PETTY CASH

The school operates a petty cash system. The Head teacher and The Finance officer ensures that any purchases made using petty cash must be authorised first. Purchases made must not exceed £25. Receipts are collected and the cash is offset on FMS or from the Voluntary account in relation to what has been purchased.

VAT AND TAXATION

The Head teacher will ensure that all staff involved in the financial administration procedures within the school are aware of the current VAT and income tax regulations in accordance with the RBG Financial Procedures and Arrangements.

SECURITY OF ASSETS, STOCK AND OTHER PROPERTY

- The Head teacher is responsible for ensuring that assets, stock, cash and other property belonging to the school is kept in safe custody.
- The Head teacher will ensure that stock levels are maintained in such a way to ensure continuity and availability of materials; maximum efficiency of annual budgets; good condition of stock and minimum wastage.
- The Premises Manager alongside the Head teacher will ensure that an inventory is maintained of all portable, desirable, valuable and uniquely identifiable items. This will include details of serial numbers, make and model where applicable. All such items will be security marked as being the property of the school.
- An annual check of the inventories against items physically held will be undertaken by the Premises Manager and documented. All discrepancies identified on this check will be investigated reported to the Governing Body.
- Where school property is loaned to staff or pupils and taken off site it will be recorded in a loans of equipment register. This will include the date of the loan, return and signature of the person borrowing

the equipment. Any such loans should be authorised by the Head teacher.

- If stocks or equipment are surplus, obsolete, damaged, not traceable or stolen, the Governing body will authorise the write-off or disposal in accordance with RBG Finance Procedures and Arrangements.
- Safes and secure cupboards/cabinets will be kept locked, the keys removed and held in a secure location as determined by the Head teacher, Finance Officer and designated staff.

INSURANCE

- The Governing Body will ensure that adequate insurance is taken out to cover risks to which the school is exposed. The school currently places its insurance scheme provided by the Royal Borough of Greenwich and the Diocese.
- An annual review of all risks will be conducted to ensure that an appropriate level of cover is maintained.
- The Governing Body will review all risks not covered by the County Council on an annual basis and determine whether additional cover should be taken out.
- The Head teacher will insure that the RBG Insurance Scheme is immediately informed of any accident, loss or other incident that may give rise to an insurance claim.
- The Governing Body will ensure that the insurance cover purchased covers the use of school property whilst off school premises.

DATA SECURITY

- The Governing Body will ensure that the school is registered in accordance with the General Data Protection Regulation (GDPR) tailored by the Data Protection Act 2018. The use of any systems to record or process information will comply with this legislation.
- The Head teacher, with the guidance of the school's IT support: Qubic, is responsible for ensuring that data is regularly backed up, and that all back-up systems are securely held in a fireproof location.
- The Head teacher, under the guidance of the school's IT support: Qubic, will ensure that the computer systems used for school management are password protected and that only authorised staff have access to the systems. Passwords should not be disclosed, should be changed regularly and updated for staff changes.
- The Head teacher will ensure that adequate protection is in place to safeguard school systems and data against computer viruses. Only authorised software will be used.
- The Head teacher has overall responsibility for breach notification within the School. They are responsible for ensuring breach notification processes are adhered to by all staff and are the designated point of contact for personal data breaches.
- In the absence of the Head teacher, please contact the Senior School Admin Officer.
- The Data Protection Officer (DPO) is responsible for overseeing this policy and developing data-related policies and guidelines.
- Please contact the DPO with any questions about the operation of this policy or the GDPR or if you have any concerns that this policy is not being or has not been followed.

The DPO's contact details are set out below: -

Data Protection Officer: Craig Stilwell

Address: Judicium Consulting Ltd, 72 Cannon Street, London, EC4N 6A

E Email: dataservices@judicium.com

Telephone: 020 3326 9174

SCHOOL AND OTHER PRIVATE FUNDS

The school holds a small private fund that is used for collections for and payments to charities and voluntary bodies, other voluntary contributions and donations, and the purchase of small gifts (e.g. for staff or parents who help the school).

The Fund is managed by the Finance Officer and is audited annually and reported to the Finance Committee.

- The Head teacher will ensure that voluntary funds are accounted for separately from the school's delegated budget and are held in a separate bank account.
- The Head teacher, on behalf of the Governing Body, will ensure that the accounting procedures for any voluntary funds reflect the same standard as those required for accounting for the school's delegated budget.

REGISTER OF BUSINESS INTERESTS

The Clerk to the Governing Body will maintain a register for each governor of any business interest that they (or any member of their immediate family) have. A copy of these is kept in the Head teacher's office.

GIFTS AND HOSPITALITY

Any gift offered or provided as an inducement or reward for commercial, contractual, regulatory or personal advantage is seen as a bribe and an offence under the Bribery Act 2010. This might include: a donation to the school in return for securing a place for a child or with a view to securing preferential treatment; a donation or offer of hospitality from a business tendering for a contract.

- All staff employed by the school should not accept from suppliers or contractors, any gift or hospitality - other than inexpensive gifts (e.g. diary/mug) offered merely as an expression of gratitude for advice or help.
- Gifts from parents, however, (especially end of term/Christmas/thank you gifts) up to an individual limit of £25 are acceptable. Any offer or gift worth more than £25 per parent (if organised by a class for example) must be recorded in a register, maintained by the Finance Officer. It is the responsibility of each staff member to ensure that this register is up-to-date.
- Donations from the St Thomas a Becket Parents' and Teachers' Association, or local organisations /shops etc. will be subject to the same scrutiny as gifts to staff. Whilst it is recognised that reimbursements from STTAB'S PTA are usually made in response to approaches from the school for specific projects, all such donations / reimbursements will also be recorded in the register.